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July 30, 2001

REGULATORY
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Guy M. Hicks
General Counsel

EXECUTIVE
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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original, four paper copies, and an electronic version of BellSouth's 271 filing.

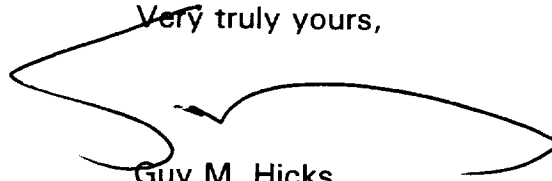
The affidavit of Mr. Douglas E. Schaller contains proprietary CLEC-specific information. This proprietary affidavit is being filed with the Authority under separate cover subject to the terms of the Protective Order entered in this proceeding. Based on BellSouth's understanding that certain CLECs object to BellSouth providing this information to other CLECs, even subject to the terms of a protective order, the proprietary version of Mr. Schaller's filing is not being provided by BellSouth to the parties of record. Copies of the redacted, non-proprietary version of Mr. Schaller's filing are enclosed. The electronic version of BellSouth's 271 filing includes the non-proprietary redacted version of Mr. Schaller's filing.

This will also confirm BellSouth's agreement to extend the TRA's 90-day review period consistent with the schedule and hearing dates proposed by BellSouth, which allow for a longer review period. An electronic copy of the

David Waddell, Executive Secretary
July 30, 2001
Page 2

enclosed is being provided to counsel of record. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be "Guy M. Hicks", written over the typed name.

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

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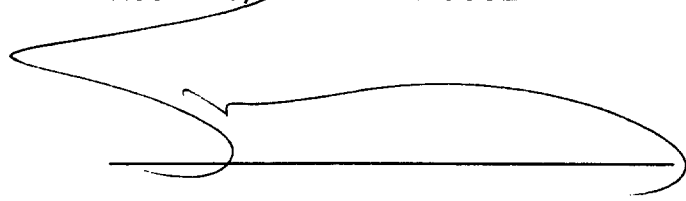
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1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF WILEY (JERRY) G. LATHAM, JR.
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO. 97-00309
5 JULY 30, 2001
6
7 Q. PLEASE STATE YOUR NAME AND YOUR JOB RESPONSIBILITIES.
8
9 A. My name is Jerry Latham. I am the Project Manager for Unbundled
10 Loops within the Interconnection Services unit of BellSouth
11 Telecommunications, Inc. ("BellSouth"). I am responsible for Product
12 Development and Product Management for unbundled loops (DS1 and
13 below) and other unbundled network elements in BellSouth's nine-state
14 territory.
15
16 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?
17
18 A. The purpose of this testimony is to explain the nondiscriminatory
19 processes and procedures through which Competitive Local Exchange
20 Companies (CLECs) pre-order and order BellSouth's xDSL-capable
21 (Digital Subscriber Line) loops. I will identify the attributes of BellSouth
22 xDSL-capable loops and describe the process through which CLECs
23 order and BellSouth provisions xDSL-capable loops. I will also
24 demonstrate that these processes provide CLECs a meaningful
25 opportunity to compete in the DSL market place.

1 UNBUNDLED xDSL AND IDSL CAPABLE LOOPS

2

3 Q. WOULD YOU GIVE A GENERAL DESCRIPTION OF THE VARIOUS
4 TYPES OF DSL LOOPS OFFERED BY BELL SOUTH?

5

6 A. The viability of DSL services is dependent, in part, on the end user's
7 distance from his serving wire center (SWC), as well as the length,
8 gauge, and status of the copper that serves that customer. To
9 compensate for these parameters, BellSouth offers CLECs a variety of
10 unbundled loops that may support DSL services from the CLEC to its
11 end user customers. The loops are known as "ADSL Capable loop,"
12 "HDSL Capable loop," "ISDN loop," "Universal Digital Channel (UDC),"
13 "Unbundled Copper Loop (UCL), Short and Long" and "Unbundled
14 Copper Loop – Non Designed" (UCL-ND).

15

16 Q. WHICH OF THE XDSL LOOPS OFFERED BY BELL SOUTH ARE THE
17 MOST VERSATILE?

18

19 A. The most versatile of BellSouth's xDSL-capable loops are the
20 Unbundled Copper Loops-Short and Long ("UCL"). These loops were
21 designed to meet CLEC requests for a basic copper loop.

22

23 Q. PLEASE DESCRIBE THE UCL LOOPS OFFERED BY BELL SOUTH.

24 A. Unbundled Copper Loop (UCL) - Short - The UCL-Short is a 2-wire or
25 4-wire loop that provides a non-loaded or "clean" copper pair to an end

1 user using the Resistance Design (RD) industry standard. Under the
2 RD standard, these loops may be up to 18,000 feet long and may have
3 up to 6,000 feet of bridged tap ("BT") exclusive of the loop length. In
4 other words, a UCL-Short loop can be 18,000 feet long and have up to
5 6,000 feet of BT. BellSouth cannot guarantee that CLEC-provisioned
6 DSL service will function properly over the UCL-Short loop, as the
7 physical characteristics (length and BT) may be inconsistent with the
8 maximum distance for many DSL services and equipment. BellSouth
9 will, however, verify that these loops have no more than 1300 ohms of
10 resistance, electrical continuity, and balance relative to the tip-and-ring,
11 and will maintain them to these requirements.

12
13 BellSouth developed the UCL-Short in direct response to CLEC
14 requests for an unbundled loop with the same specifications that
15 BellSouth uses for its own wholesale ADSL service. This loop meets
16 those criteria. The UCL-Short has been available to CLECs since the
17 second quarter 2000.

18
19 Unbundled Copper Loop (UCL) - Long - The UCL-Long is a 2-wire or
20 4-wire copper loop that is longer than 18,000 feet. This loop was
21 developed in response to CLEC requests, as well as the UNE Remand
22 Order's directive that ILECs should provide xDSL-capable loops
23 wherever requested by the CLEC. Normal telephony standards dictate
24 that all copper loops exceeding 18,000 feet in length must be loaded to
25 properly service dial-tone or POTS type customers. Therefore, in

1 almost all cases, a CLEC seeking to provide functioning DSL service
2 will need, in addition, to place an order for "loop conditioning" -
3 BellSouth's Unbundled Loop Modifications (ULM) product - to remove
4 the load coils and/or BT from these loops in order to transform them
5 into "dry" or "clean" copper loops. The CLEC would pay the ULM costs
6 separate from the cost of the loop itself.

7

8 By the end of June 2001, BellSouth had received orders for and
9 deployed 7,433 UCL Short and Long loops region-wide and 1,440 in
10 Tennessee.

11

12 Q. WHAT OTHER TYPES OF XDSL LOOPS ARE OFFERED BY
13 BELLSOUTH?

14

15 A. In addition to the UCL-Short and Long, BellSouth offers CLECs four
16 other xDSL-capable loops: ADSL-capable loop; HDSL-capable loop;
17 ISDN-capable loop; and Universal Digital Channel ("UDC") loop.

18

19 Q. CAN YOU BRIEFLY DESCRIBE THE HISTORY OF THE
20 DEVELOPMENT OF THESE OTHER TYPES OF LOOPS?

21

22 A. Yes. BellSouth developed two of these xDSL-Capable loop offerings,
23 the HDSL-capable loop and the ADSL-capable loop, in direct response
24 to the FCC's Local Competition Order. That Order defined loops to
25 include "two-wire and four-wire analog voice-grade loops, and two-wire

1 and four-wire loops that are conditioned to transmit the digital signals
2 needed to provide services such as ADSL, HDSL and DS1-level
3 signals."

4
5 Q. PLEASE DESCRIBE THE HDSL AND ADSL LOOPS.

6
7 A. HDSL-Capable Loop – For technological reasons, high-speed DSL
8 services work best on short, clean-copper loops. BellSouth's HDSL-
9 capable loop meets these requirements. BellSouth screens HDSL-
10 capable loops to ensure that they meet stringent industry standards for
11 Carrier Serving Area (CSA) transmission specifications to better
12 support DSL services. Under these strict technical standards, the end
13 user must be served by non-loaded copper and the loop typically
14 cannot be more than 12,000 feet long. If 26-gauge copper is used, the
15 limit is 9,000 feet or less. HDSL-Capable loops may have up to 2,500 ft
16 of BT, and 850 ohms or less of resistance.

17
18 The HDSL-capable loop has been available to CLECs since fourth
19 quarter 1996. By the end of June 2001, BellSouth had deployed 440
20 HDSL-capable loops region-wide, of which 69 are in Tennessee.

21
22 ADSL-Capable Loops – Originally, the ADSL loop offering was set to
23 the same CSA criteria as the HDSL-capable loop. In response to
24 CLEC requests, however, and with the establishment of industry
25 guidelines for loop types that support ADSL service, BellSouth modified

1 the design criteria for the ADSL-capable loop in the first quarter 2000 to
2 the Revised Resistance Design (RRD) standards. RRD standards
3 require a non-loaded copper loop, up to 18,000 feet in length, with up
4 to 6,000 ft of BT inclusive of loop length, and 1300 ohms or resistance.
5 "Inclusive of loop length" means that for every foot of BT, the loop
6 length is reduced by an equal amount. Therefore, a RRD loop that has
7 4,000 ft of BT could be no longer than 14,000 ft.

8

9 This loop has been available to CLECs since fourth quarter 1996. By
10 the end of June 2001, BellSouth had provided CLECs 15,245 ADSL-
11 capable loops region-wide, of which 1,366 are in Tennessee.

12

13 Q. PLEASE DESCRIBE HOW BELL SOUTH CAME TO DEVELOP THE
14 ISDN-CAPABLE AND UDC LOOPS.

15

16 A. As with the ADSL and HDSL loops mentioned above, the ISDN-
17 capable loop was developed in response to the release of the Local
18 Competition Order. However, as described below, the ISDN loop is not
19 always suitable for Integrated Digital Subscriber Line (IDSL) services.
20 Therefore, the CLECs requested that BellSouth provide a loop that
21 could support the hybrid form of DSL service known as IDSL. In
22 response to these requests, BellSouth developed the UDC loop.

23

24 Q. PLEASE DESCRIBE THE ISDN-CAPABLE AND UDC LOOPS.

25

1 A. ISDN-Capable Loops – While not intended for xDSL use, ISDN-
2 capable loops may be used to support the DSL service known as IDSL.
3 BellSouth provisions its ISDN-capable loops according to applicable
4 industry standards (i.e., ANSI), which means they may be provisioned
5 over copper or via a Digital Loop Carrier (DLC) system. These loops
6 are free of load coils, but are not referred to as "clean copper loops"
7 because they may be provisioned via DLC systems that are completely
8 compatible with ISDN service, but not most xDSL services.

9

10 Q. PLEASE DESCRIBE UDC LOOPS.

11

12 A. UDC Loops - As recognized by the FCC in its FCC-00-238 Order, not
13 all ISDN loops are completely compatible with IDSL service. Because
14 of this, BellSouth developed the UDC loop, which was introduced on
15 May 31, 2000. This loop is identical to the ISDN loop, but is
16 provisioned in a manner that supports "data-only" ISDN, which will
17 better meet the needs of CLECs who want to deploy IDSL. This loop
18 has been available to CLECs since June 1, 2000. By the end of June
19 2001, BellSouth had provided CLECs 10,870 UDC loops region-wide,
20 of which 581 are in Tennessee.

21

22 Q. HAS BELL SOUTH DEVELOPED ANY OTHER TYPE OF XDSL
23 LOOP?

24

25 A. Yes. At the request of CLECs, BellSouth has developed another xDSL-

1 capable loop. This loop is known as the Unbundled Copper Loop –
2 Non Designed (UCL-ND). It is a non-loaded copper loop that generally
3 has 1300 ohms or less of resistance and does not have a specific
4 length limitation. The length is driven by many factors but is generally
5 less than 18,000 feet long. This loop does not go through the “design”
6 process. Therefore, it does not have a remote access test point and
7 does not come standard with a Design Layout Record (DLR). This loop
8 was developed to respond to the CLECs’ desire for an xDSL loop with
9 a lower non-recurring cost.

10

11 Q. WHY DOES BELLSOUTH OFFER SO MANY TYPES OF XDSL
12 LOOPS?

13

14 A. To understand why BellSouth offers a variety of xDSL loops, one need
15 only review the history of xDSL-capable loops. BellSouth has
16 developed this variety of xDSL loop types in direct response to CLEC
17 requests as well as the evolving scope of its obligations under
18 applicable FCC rules and regulations. As described above, BellSouth
19 first developed the HDSL and ADSL-capable loops to comply with the
20 obligations stated in the Local Competition Order. Once developed,
21 these loops were included in CLEC Interconnection Agreements. In
22 the months following the release of the Local Competition Order,
23 BellSouth developed several additional xDSL loop offerings at the
24 request of CLECs operating within BellSouth’s region. Again,
25 BellSouth’s obligation to provision these loops was memorialized in

1 various Interconnection Agreements. These continuing contractual
2 obligations for all of the loop types make it impossible for BellSouth to
3 discontinue any xDSL loop; rather, as BellSouth develops new product
4 offerings, BellSouth simply adds to the list of options from which the
5 CLEC can choose.

6

7 The benefit to the CLECs of this historical growth of offerings is that
8 CLECs have a variety of loop types from which they can choose to best
9 meet their technical needs in providing telecommunications services to
10 its customers for the least cost. The fact that BellSouth offers different
11 loop types, however, does not in any way restrict a CLEC's ability to
12 offer any particular type of xDSL service it may desire over any loop in
13 BellSouth's network. Indeed, the only restrictions that limit a CLEC's
14 choice of DSL technologies are those established by industry standards
15 bodies to ensure the integrity of voice service.

16

17 Q. HAS BELL SOUTH ENTERED INTO INTERCONNECTION
18 AGREEMENTS WITH FACILITIES-BASED CLECS THROUGH
19 WHICH IT IS PROVIDING THESE XDSL CAPABLE LOOPS?

20

21 A. Yes. BellSouth has entered into Interconnection Agreements with
22 facilities-based carriers in Tennessee to provide each of the loops
23 described above. (See e.g. Interconnection Agreement between
24 BellSouth and Covad Company, approved by the Tennessee
25 Regulatory Authority on May 30, 2001.)

1

2 Q. WHERE CAN YOU FIND MORE INFORMATION ON THESE TYPES
3 OF LOOPS?

4

5 A. Additional information about all of BellSouth's xDSL loops can be
6 viewed in Exhibits 1 through 5 to my testimony and on BellSouth's
7 internet web site at:

8 "www.interconnection.bellsouth.com/products/unes.html".

9

10 Q. CAN YOU SUMMARIZE THE TYPES OF AVAILABLE LOOPS AND
11 THEIR CHARACTERISTICS?

12

13 A. Yes. The HDSL capable loop (using CSA standards) will provide clean
14 copper pairs to customers up to 12,000 feet from the Central Office
15 (CO).

16

17 The ADSL capable loop (using RRD standards) and the UCL-Short
18 (using RD standards) will provide clean copper pairs to customers up to
19 18,000 feet from the CO (using different criteria for BT).

20

21 The UCL-Long, in conjunction with the ULM conditioning product,
22 allows CLECs to serve customers beyond 18,000 feet from the CO
23 using clean copper pairs.

24

25 The ISDN and UDC capable loops will give the CLEC the option of

providing IDSL service to any customer even if that customer does not have clean copper pairs available at their address.

LOOP TYPE	UDL – HDSL	UDL – ADSL	UCL Short	UCL Long	UCL - ND	ISDN/UDC
Max loop length	12 kft	18 kft	18 kft	Unlimited	Undefined (generally 18kft)	18 kft (Copper) No limit (DLC)
Max total bridge tap	2.5 kft inclusive	6 kft inclusive	6 kft exclusive	12 kft exclusive	6 kft exclusive	6 kft inclusive
Longest single Bridge tap	2.0 kft	6 kft	6 kft	6 kft	6 kft	6 kft
Max Resistance in Ohms	850	1300	1300	2800	1300	1300 (copper)
Max Loss (per 73600)	35db@100KHz	42db@40KHz	46db@40KHz	N/A	Varies (Similar to UCL-Short)	42db@40KHz
Service Inquiry Required	Yes	Yes	Yes	Yes	No	No
Number of wires	2 or 4 wire	2 wire	2 or 4 wire	2 or 4 wire	2 wire	2 wire

The chart above shows the technical specifications for each of BellSouth's xDSL-capable loops. BellSouth developed each of these loops, to the extent possible, in accordance with industry standard physical characteristics and specifications. Application of these standards allows BellSouth to provision, maintain and repair these loops efficiently while retaining network integrity for all of BellSouth's services, including non-DSL services. If, however, a CLEC wants other, non-standard loop types, BellSouth will work cooperatively with the CLEC to develop these through our Interconnection Agreement negotiation sessions (as we have done for the UCL-Short) or through the Bona Fide Request (BFR) process.

1

2

PRE-ORDERING / ORDERING PROVISIONING

3

4

Q. WOULD YOU PLEASE DEFINE AND DESCRIBE LOOP MAKE-UP INFORMATION?

5

6

7

A. "Loop make-up information" ("LMU") refers to the detailed information regarding a given loop's physical characteristics that an interested CLEC can use to determine the feasibility of provisioning xDSL service to a particular end user customer. This information includes: loop length, wire gauge, loop medium (copper or fiber), and information regarding any bridged tap, load coil, or repeaters present on the loop. Through the manual processes discussed in this testimony, BellSouth provides CLECs access to all of the loop makeup information available to BellSouth personnel.

16

17

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25

BellSouth has developed a loop qualification process that enables a CLEC to access loop make-up information via manual or electronic interfaces. Manual loop qualification is available when BellSouth's electronic records do not have LMU about a particular loop. With this information in hand, CLECs can determine whether and what type of xDSL service can be provisioned over the loop facilities that serve their prospective customers. Electronic access to loop make-up information is addressed in the testimony of Mr. Ronald Pate in Docket No. 01-00362. The process for providing loop make-up information on a

1 manual basis is described below.

2

3 Q. WHAT IS THE PROCESS FOR OBTAINING LOOP MAKE-UP
4 INFORMATION MANUALLY?

5

6 A. The manual loop make-up process is as follows: the CLEC initiates the
7 manual loop make-up process by submitting a request for loop make-
8 up information either to its account team (AT) or the Complex Resale
9 Support Group (CRSG). A copy of the form provided to CLECs for
10 their use in ordering is attached as Exhibit 4 to my Testimony. The
11 CRSG/AT forwards the request to the appropriate Service Advocacy
12 Center (SAC) depending upon the end user's address. The SAC will
13 physically look through BellSouth's Central Office (CO) records to
14 gather the loop make-up information. The SAC sends the loop make-
15 up information, which includes information such as the length and
16 gauge of cable, number of load coils (LC), and the length and gauge of
17 BT, back to the CRSG/AT. The CRSG/AT sends the loop make-up
18 information to the CLEC, who is then in a position to determine
19 whether, and what type of, xDSL services it can offer over the available
20 facilities.

21

22 If the CLEC makes the decision to provide service using the facility but
23 needs to have the loop conditioned, it can use BellSouth's Unbundled
24 Loop Modification (ULM) process in order to modify any existing loop to
25 be compatible with each CLEC's particular hardware requirements.

1 The ULM process conditions the loop by the removal of any devices
2 that may diminish the capability of the loop to deliver high-speed
3 switched wire line capability, including xDSL service. Such devices
4 include, but are not limited to load coils, bridged taps, low pass filters,
5 and range extenders. The ULM offering provides for removal of
6 equipment on loops equal to or less than 18,000 feet, as well as loops
7 that are longer than 18,000 feet. These devices are placed on copper
8 loops to enhance the voice characteristics when provided on long
9 copper facilities or to otherwise comply with standards for other
10 services such as PBX trunks. The CLEC may select the level of line
11 conditioning it desires and will be required to pay only for the level of
12 conditioning it selects. BellSouth will provide line conditioning on a
13 CLEC request for unbundled loops, whether or not BellSouth offers
14 advanced services to the end-user customer on that loop. BellSouth
15 has established cost-based rates for the ULM offering.

16

17 ORDERING

18

19 Q. PLEASE DESCRIBE THE MANUAL AND ELECTRONIC ORDERING
20 PROCESSES FOR XDSL CAPABLE LOOPS.

21

22 A. The manual ordering process for xDSL and IDSL capable loops is
23 virtually identical to the manual ordering processes and procedures for
24 other loop types. This process is described in the testimony of
25 Mr. Ken Ainsworth in Docket No. 01-00362.

1

2 BellSouth's electronic pre-ordering and ordering interfaces have been
3 enhanced to provide electronic access to loop makeup information and
4 electronic ordering of ADSL-capable loops, HDSL-capable loops, and
5 UCLs. For further information, see the testimony of Mr. Pate on
6 Operations Support Systems in Docket No. 01-00362.

7

8 PROVISIONING AND TESTING

9

10 Q. WHAT INTERVALS HAVE BEEN ESTABLISHED FOR THE
11 PROVISIONING OF XDSL CAPABLE LOOPS?

12

13 A. BellSouth has established intervals for the provisioning of DSL loops
14 and supporting services. The provisioning interval for the xDSL loop is
15 5 business days. The interval for manual Loop-Make Up is 3 business
16 days.

17

18 Due to the widely varied configurations for loop deployment, BellSouth
19 has agreed to establish a target interval of 14 business days for
20 provisioning loops that require conditioning.

21

22 Q. WHAT TYPES OF TESTING ARE PERFORMED ON UNE LOOPS,
23 INCLUDING XDSL CAPABLE LOOPS?

24

25 A. During the installation of UNE loops, BellSouth performs tests

1 necessary to ensure that the loop being provisioned meets the
2 specifications for the loop type ordered by the CLEC. In addition,
3 BellSouth has agreed to provide Additional Cooperative Acceptance
4 Testing. This cooperative testing provides the CLECs with a means to
5 test loops beyond those tests that BellSouth normally performs during
6 the provisioning process.

7

8 In addition, through the negotiation of Interconnection Agreements,
9 BellSouth and the CLECs have established joint provisioning
10 procedures for xDSL loops. See Interconnection Agreement between
11 BellSouth and Covad, approved by the Tennessee Authority
12 September 9, 2000, Att. 2, § 2. These joint procedures allow BellSouth
13 and the CLEC to be actively involved in the testing and provisioning of
14 UNE loops throughout the provisioning process. This helps ensure that
15 the circuit works properly for the CLEC's intended service from the first
16 day that the circuit is activated to the end user.

17

18 So far as it is technically feasible, BellSouth will perform a broad range
19 of tests on conditioned loops for all of the line's features, functions and
20 capabilities, and does not limit its testing to voice-grade tests.

21

22 SPECTRUM MANAGEMENT

23

24 Q. PLEASE DESCRIBE SPECTRUM MANAGEMENT.

25

1 A. CLECs are free to provide any telecommunications service they choose
2 on any unbundled loop, as long as that service does not negatively
3 impact other services and providers. BellSouth's TR73600 document
4 and other industry standards for Power Spectral Density masks, once
5 established, will help control these negative impacts and allow multiple
6 carriers' services to co-exist harmoniously. BellSouth provides CLECs
7 access to TR73600 via BellSouth's internet website. It should be
8 noted, however, that BellSouth cannot be expected to guarantee a
9 CLEC's service will work on loops not intended for a particular service.
10 For example, a CLEC may order a voice-grade loop and attempt to put
11 some type of high-speed data service on that loop. If that service
12 works (without disrupting other services), then all is well. If not,
13 BellSouth can only maintain and repair the circuit as a voice-grade line
14 (i.e., the type of loop ordered). Of course, the CLEC would have the
15 option to replace the voice grade line with an xDSL-capable loop, and
16 could use the ULM product to condition the loop to support the CLEC's
17 chosen service.
18
19 Currently, efforts are underway at the national level to adopt standards
20 that minimize the potential for interference when loops adjacent to one
21 another in a binder group are used to provide divergent technologies
22 (e.g., ADSL and HDSL). National standards bodies are working
23 towards establishing industry consensus on how best to accommodate
24 xDSL-based services on a wire line network originally designed to carry
25 voice transmissions. BellSouth strongly supports this effort and is

1 involved in the national standards bodies working on these issues.

2

3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

4

5 A. Yes.

6

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25

AFFIDAVIT

STATE OF Alabama

COUNTY OF Jefferson

BEFORE, ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Wiley Gerald Latham Jr. – Product Manager-Interconnection Marketing, who being by me first duly sworn, deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be as set forth in the annexed testimony consisting of 18 pages and 5 exhibit (s).


Wiley Gerald Latham Jr.

SWORN TO AND
SUBSCRIBED BEFORE ME
this the 16 day
of July, 2001.


NOTARY PUBLIC

My Commission expires: 3-21-05

EXHIBIT WGL-1

BellSouth Unbundled Digital Loops

BellSouth Unbundled Digital Loops

Service Description

The UDL will be a dedicated digital transmission facility from BST's MDF to a customer's premises. This facility will allow the end user to send and receive traffic that utilize technologies like ISDN; Enhanced Electronic (EE) capabilities such as HDSL/ADSL; and high capacity services such as DS-1 when the loop is connected to the proper packet/circuit switch. This facility will include a Network Interface Device (NID) at the customer's location for the purpose of connecting the loop to the customer's inside wire. The UDLs can be configured as 2-wire ISDN (2W/I); 2-wire UDC (2W/UDC); 2-wire ADSL-capable; 4-wire DS1 & ISDN (4W/DI); 2-wire HDSL capable; 4-wire HDSL capable facilities & 4-wire DS0 level loops. It should be noted that on the xDSL-capable loops that BST does not provide the Enhanced Electronics such as the DSLAM.

Features and Benefits

UDL will be a designed circuit and BST will provide a Design Layout Record (DLR). BST will issue a Firm Order Confirmation ("FOC") within 48 hours after receipt of the valid LSR and a DLR to the ordering party within 5 business days after the FOC, upon review of and in response to the ordering party's LSR, to begin the provisioning process.

BST will perform these repair functions during normal work hours (e.g. 8 am to 5 pm local time). If the CLEC requests that BST repair a trouble after normal working hours, the CLEC will be billed the appropriate overtime charges associated with this type request.

For all UDLs, except the 2W-UDC, BST will perform order coordination (OC) activities associated with an existing circuit that requires a coordinated conversion. In these cases, BST will coordinate the "turn-up" of the new circuit; the use of Remote Call Forwarding (if needed); and disconnect orders in order to minimize the disruption of an existing circuit. BST will not perform these activities on new circuits that do not require a coordinated conversion.

Performance Standards

Digital Loops may be provided via metallic facilities, DLC, or both. The insertion loss of the metallic facility, measured at 28 kHz between 135 ohm terminations, shall be less than 40 db.

The UDL-4W/D0 is offered in three performance levels: 19.2K and below; 56K and 64K. The CLEC must specify on the LSR which type of 4W/D0 that is to be utilized so that the loop criteria can be properly aligned with the intended service.

The interface at the CLEC is a 4-wire interface, described as a DS0A interface in Bellcore TA-TSY-000077, Digital Channel Banks- Requirements for Dataport Channel Unit Functions.

Basic Rate Access ISDN and UDC loops may be provided via metallic facilities, DLC, or both. The insertion loss of the metallic facility, measured at 40 kHz, shall be less than 42 db. No dc specifications are supported. ISDN loops provisioned via copper will support IDSL service, however, some ISDN loops provisioned via DLC will not. Therefore, if the CLEC wants to ensure IDSL service, the UDC loop must be

ordered to ensure proper configuration when DLCs are employed.

UDC loops are ISDN loops that are configured for data only applications such as ISDL, etc.. They may be provisioned over copper, and in some cases may be provisioned through a DLC system.

BST will ensure that UDC loops are provisioned on compatible slots within DLC systems to ensure data compatibility. UDC loops are intended to support a CLEC's ISDL service but is not guaranteed to do so.

The interface at both the CLEC and the Network Interface is a 2W interface as defined in ANSI T1.601-1992, ISDN Basic Access Interface for use on Metallic Loops for Applications on the Network Side of the NT.

Asymmetric Digital Subscriber Line (ADSL) Metallic Interface is a 2W-ADSL (sometimes called a 2W-EE) consisting of metallic facilities only. These facilities will be provided with no DLC, load coils or repeaters. These loops will conform to the RRD guidelines as described in Committee T1 Technical Report No. 28 Bit Rate performance on these loops are dependent upon the Customer Premises Equipment (CPE), therefore, BST does not guarantee a particular bit rate associated with these loops.

High-bit rate Digital Subscriber Lines (HDSL) is a transport technology that can be either 2 or 4 wire circuits and are ordered as 2W/HDSL or 4W/HDSL (sometimes called 2W-EE or 4W-EE). The loop facility consists of only metallic facilities and will be provisioned according to CSA guidelines as described in Committee T1 Technical Report No. 28. These loops typically will be less than 9000 feet in length (including no

more than 2,500 ft. of bridged tap/end section). Bit Rate performance on these loops are dependent upon the Customer Premises Equipment (CPE), therefore, BST does not guarantee a particular bit rate associated with these loops.

The signal applied at either interface shall meet the following specifications:

- The average signal power shall not exceed +15.0 dBm across 100 Ω .
- The Power Spectral Density shall not exceed -38 dBm/Hz from 0 Hz to 196 kHz, -89 dB/decade attenuation from -38 dBm/Hz at 196 kHz to -118 dBm/Hz at 1.96 MHz, and -118 dBm/Hz above 1.96 MHz. This requirement shall be met when measured with a 100 Ω termination.

The HDSL loop facilities consist of only metallic facilities meeting CSA design guidelines as documented in Committee T1 Technical Report No. 28. The dc resistance of a single wire pair should not exceed 850 Ω .

Ordering Process

UDL are ordered via an LSR, which is issued through the LCSC.

Where facilities are available, BST will install 1 to 5 UDLs, except 2W-ISDN and 2W-UDC, within a 5-7 business days interval. The 2W-ISDN and 2W-UDC loops will have a 12 business day provisioning interval (for 1 to 5 loops) to accommodate for their unique needs such as the appropriate DLC plugs.

For more information regarding this product, please contact your account team representative

EXHIBIT WGL-2

Unbundled Asymmetrical Digital Subscriber Line (ADSL)
Compatible Loop

And

Unbundled High Bit Rate Digital Subscriber Line (HDSL)
Compatible Loop

CLEC Information Package

BellSouth Unbundled ADSL/HDSL Compatible Loops

Unbundled Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop

and

Unbundled High-Bit-Rate Digital Subscriber Line (HDSL) Compatible Loop

***CLEC
Information Package***

(Version 4)

BellSouth Unbundled ADSL/HDSL Compatible Loops

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BellSouth Unbundled ADSL/HDSL Compatible Loops

Introduction & Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the UNE described herein. Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Web site.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Revisions

Version 4

- 1) Page 1 – "Version 4" replaces "Version 3".
- 2) Footnote on each page – date changed from "8/25/00" to "10/13/00" and "Version 3" changed to "Version 4".
- 3) **Service Order Requirements** section – *LSR form sub-section*:
 - Added "Project" under the **LSR Field**
 - Under the "Information Required" column added "If Unbundled Loop Modification is ordered, populate with the following:
 - ULMLC – for Load Coil removal
 - ULMBT – for Bridge Tap removal
 - ULMBTLC – for Load Coil and Bridge Tap removal"

Version 3

- 1) Page 1 – "Version 3" replaces "Version 2".
- 2) Footnote on each page – date changed from 7/25/00 to 8/25/00 and Version 2 changed to Version 3.
- 3) **Service Capabilities** section, first paragraph, second sentence – replaced "DLSAM" with "DSLAM".
- 4) **Technical Requirements** section, **ADSL compatible loop** sub-section, first paragraph, second sentence – reference to Committee T1 Technical Report No. 28 changed to Bellcore SR-TSV-002275.
- 5) **Network Configuration** section – replaced "BST" with "BellSouth".
- 6) **Service Order Requirements** section:
 - *LSR form sub-section* – first paragraph, deleted Ordering and Billing Forum (OBF) guidelines reference and replace with **BellSouth Ordering Guide for CLECs** (Local Service Ordering Guidelines, version 2 (LSOGv2)) or the **BellSouth Business Rules for Local Ordering** (Local Service Ordering Guidelines, version 4 (LSOGv4)).
 - *LSR form sub-section* – first paragraph, deleted last sentence
 - *Service Inquiry (SI) form sub-section* – added first sentence – "A Service Inquiry is required, dependent on the ordering scenarios described in the **Ordering & Provisioning**

BellSouth Unbundled ADSL/HDSL Compatible Loops

section, for ordering an ADSL/HDSL compatible loop."

- 7) **Service Inquiry Form** – added "click here to download" under the heading **Service Inquiry Form** which allows the CLEC to download the SI to a usable format for CLEC preparation.
- 8) Added an **Acronyms** section.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Revisions (continued)

Version 2

- 1) The version 1 **Ordering and Provisioning** section was replaced with a new **Ordering and Provisioning** section that contains three ordering scenarios.
- 2) The **Rate Elements and USOCs** section was updated to reflect description changes in the existing elements and to add new elements:

Old Element	New Description/Element
2 Wire Unbundled ADSL Compatible Loop	2 Wire Unbundled ADSL compatible loop, includes manual service inquiry and facility reservation
NA	2 Wire Unbundled ADSL compatible loop, without manual service inquiry and facility reservation
2 Wire Unbundled HDSL Compatible Loop	2 Wire Unbundled HDSL compatible loop, includes manual service inquiry and facility reservation
NA	2 Wire Unbundled HDSL compatible loop, without manual service inquiry and facility reservation
4 Wire Unbundled HDSL Compatible Loop	4 Wire Unbundled HDSL compatible loop, includes manual service inquiry and facility reservation
NA	4 Wire Unbundled HDSL compatible loop, without manual service inquiry and facility reservation

- 3) In the **Service Order Requirements** section, additional clarification provided on "NCI at CLEC" codes format and a note added for 4 Wire HDSL:

"0" is a numeric zero character

Orders for 4 Wire HDSL must include two CLEC cable and pairs on the LSR

- 4) Old **Service Inquiry (SI) Form** (revised: 2/29/00) and **SI Preparation** replaced with new **Service Inquiry** (revised: 7/21/00) and **Instructions for Preparing Service Inquiry**.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Service Description

The Unbundled Asymmetrical Digital Subscriber Line (ADSL) or the High Bit Rate Digital Subscriber Line (HDSL) compatible loop is a dedicated digital transmission facility from BellSouth's Main Distribution Frame (MDF) to an end-user's premises. These loops will allow the end user to send and receive traffic that utilize the Enhanced Electronic (EE) capabilities for HDSL or ADSL when the loop is connected to the CLEC's appropriate equipment. The loop facility will include a Network Interface Device (NID) or equivalent demarcation point at the end-user's location for the purpose of connecting the loop to the customer's inside wire.

BellSouth offers the following:

- 2 Wire ADSL compatible loop
- 2 Wire HDSL compatible loop
- 4 Wire HDSL compatible loop

Service Capabilities

BellSouth will only provide the loop facilities with these offerings. BellSouth does not provide the Enhanced Electronics such as the Digital Subscriber Line Access Multiplexer (DSLAM) or any other electronics with the unbundled ADSL or HDSL compatible loops.

The ADSL/HDSL compatible loops will be designed circuits and are provisioned with test points. BellSouth will provide a Design Layout Record (DLR).

BellSouth will perform installation testing (other than switch-based) that is needed to ensure the loop meets the specifications of **BellSouth's Technical Reference 73600** (TR73600).

BellSouth will perform order coordination (OC) activities associated with Number Portability and/or disconnect orders. OC is intended to convert an existing customer to a new local service provider using the ADSL/HDSL compatible loops in a manner that minimizes the end-user's dial-tone interruption. BellSouth will notify the CLEC of the appropriate conversion time and will then perform the work within the negotiated interval.

If the CLEC requests work after normal working hours, overtime rates will apply for work outside of 8:00 a.m. to 5:00 p.m. local time.

If the CLEC's end user has existing service with BellSouth that utilizes a digital quality loop, and wants to change local service providers, BellSouth will attempt to reuse the end user's existing loop.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Technical Requirements

ADSL compatible loop

The ADSL compatible loop is a two wire metallic facility only. If the loop is available, it will be provided with no Digital Loop Carrier (DLC), load coils or repeaters. These loops will conform to the Revised Resistance Design (RRD) guidelines for non-loaded facilities as described in Bellcore SR-TSV-002275. The loop facility will consist of a loop 18kft or less which may include 6kft of bridge tap with a resistance of 1300 ohms or less if the loop is available.

Where the loop facility does not meet ADSL compatible loop specifications and it is determined that the loop can be modified to meet these specifications, the CLEC may request BellSouth's Unbundled Loop Modification (ULM). In these situations and as a chargeable option, BellSouth will use the ULM process to modify the loop facility to ADSL compatible loop specifications. Additionally, the ULM product can be utilized to remove any bridged tap sections as requested by the CLEC. The rates for ULM are in addition to the ADSL loop rate.

BellSouth does not guarantee a particular bit rate associated with these loops. The transmission and bit rate speed of ADSL type services is dependent on the CLEC's equipment.

ADSL compatible loops will meet the parameters specified in **BellSouth TR73600**.

HDSL compatible loop

High-bit rate Digital Subscriber Line (HDSL) is a transport technology that can utilize a 2 or 4 Wire circuit. The HDSL compatible loop can be ordered as a 2 Wire or 4 Wire HDSL compatible loop. The loop facility consists of only metallic facilities and will be provisioned according to CSA guidelines as described in Committee T1 Technical Report No. 28. These loops include no more than 2500 feet of bridge tap/end section with a resistance of 850 ohms or less.

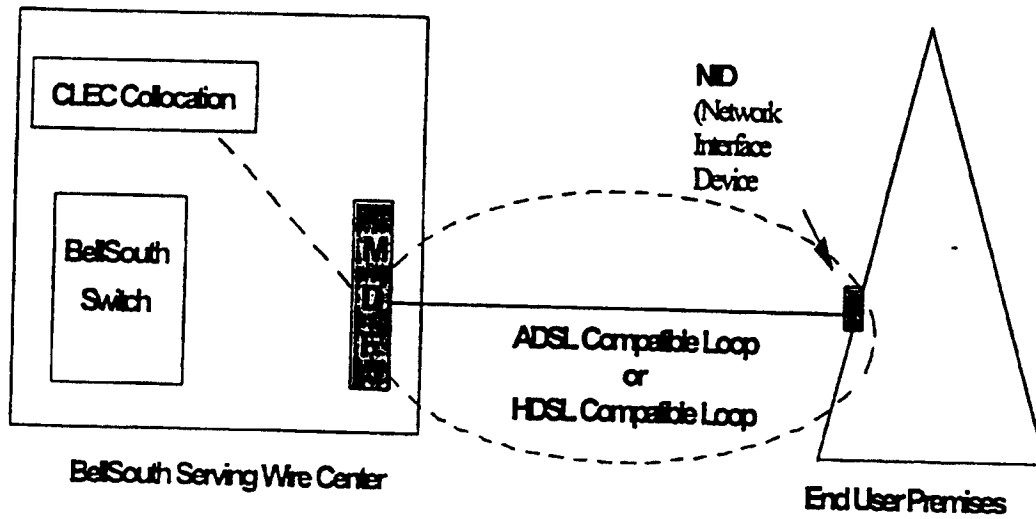
Where the loop facility does not meet HDSL compatible loop specifications and it is determined that the loop can be modified to meet these specifications, the CLEC may request BellSouth's ULM. In these situations and as a chargeable option, BellSouth will use the ULM process to modify the loop facility to HDSL compatible loop specifications. Additionally, the ULM product can be utilized to remove any bridged tap sections that are requested by the CLEC. The rates for ULM are in addition to the HDSL loop rate.

BellSouth does not guarantee a particular bit rate associated with these loops. The bit rate speed is dependent upon the CLEC's equipment.

HDSL compatible loops will meet the parameters specified in **BellSouth TR73600**.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Network Configuration



BellSouth Unbundled ADSL/HDSL Compatible Loops

Ordering & Provisioning

This section will describe ordering scenarios available to the CLEC for ADSL or HDSL compatible loop ordering. It is important to note that it is now possible for a CLEC to obtain Loop Make-up (LMU) prior to placing an order for an ADSL or HDSL loop. This option will be referred to as "prior LMU".

There is a key distinction in the "with prior LMU" and the "without prior LMU" scenario. "With prior LMU" indicates that LMU was ordered and obtained by the CLEC prior to placing the ADSL or HDSL loop order; whereas "without prior LMU" indicates that the LMU look-up and facility reservation function will be handled as *part of* the loop ordering process. Lastly, Service Inquiry (SI) forms for LMU are distinct and separate from the SI forms required in the submission of a CLEC's ADSL or HDSL loop service order.

The LMU with Facility Reservation Number (FRN) option enables the CLEC to receive LMU and reserve a loop facility. This allows the CLEC a limited time span (*4 days*) to place an ADSL or HDSL loop order using the pre-order LMU. For additional detail regarding the LMU/FRN process, refer to the **LMU Product Package**.

If a prior LMU/FRN is obtained, the CLEC may use the FRN facility once it later submits a Local Service Request (LSR) to order an ADSL or HDSL loop. However, it should be noted that the specific loop type (ADSL or HDSL) ordered on the LSR must match the specifications of the facility for which prior LMU/FRN has been requested. BellSouth will use best efforts to assign the reserved facility on which the CLEC has obtained the FRN. If the loop type the CLEC has ordered on the LSR form does not match the reserved facility, the provisioning system will not use the reserved facility. Instead, the provisioning system will automatically override the FRN and attempt to assign a facility that does match the specifications of the loop type ordered. For information regarding the technical specifications refer to the Technical Requirements section of this document or to the **BellSouth TR73600**.

The sub-sections on the following pages describe the various ordering scenarios:

BellSouth Unbundled ADSL/HDSL Compatible Loops

Ordering & Provisioning (continued)

Loop Order with prior Loop Make-Up (LMU) and Facility Reservation Number (FRN)

The CLEC in this scenario would have requested a LMU with FRN prior to placing an order for the ADSL or HDSL compatible loop. In this scenario the CLEC does not require and is not ordering Unbundled Loop Modification (ULM) on requested loop facility. The non-recurring rate for the loop in this scenario excludes the cost of the manual service inquiry LMU and FRN since the CLEC has previously paid for the LMU with FRN.

Steps

1. CLEC requests and receives LMU/FRN through the **LMU process**.
2. CLEC prepares and sends a Local Service Request (LSR) form w/FRN to the Local Carrier Service Center (LCSC). CLEC must specify the loop type (ADSL or HDSL) on the LSR.
3. Once a complete and correct LSR has been processed, the LCSC will forward a Firm Order Confirmation (FOC) to the CLEC.
4. The requested loop type will be provisioned through the ordering and provisioning systems according to the targeted intervals stated in the Interval section.

Loop Order with prior LMU & FRN and with Unbundled Loop Modification (ULM)

This scenario is for an ADSL or HDSL compatible loop for which the CLEC is requesting **ULM**. The CLEC would have also requested a LMU with FRN prior to requesting the loop with ULM. The non-recurring rate for the loop in this scenario excludes the cost of the manual service inquiry LMU and FRN since the CLEC has previously paid for the LMU with FRN. Rates for ULM will be charged to the CLEC as separate rate elements.

Steps

1. CLEC requests and receives LMU/FRN through the **LMU process**.
2. CLEC prepares a firm order Service Inquiry (SI) and must specify the loop type, the required modifications and the FRN of the facility which requires modification.
3. CLEC prepares the LSR for the requested loop type with FRN.
4. CLEC sends the SI and LSR to its BellSouth CRSG/Account Team Representative.
5. CRSG/Account Team Representative holds the LSR and sends the SI to Outside Plant Engineering (OSPE).
6. OSPE issues an engineering job for the requested ULMs and determines an estimated completion date (ECD) for completing the modifications.
7. OSPE forwards the SI with ULM ECD to the CRSG/Account Team Representative.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Ordering & Provisioning (continued)

8. CRSG/Account Team Representative notifies the CLEC of the ULM ECD.
9. When ULM is complete, OPSE notifies the CRSG/Account Team Representative who in turn notifies the CLEC.
10. CRSG/Account Team Representative forwards the SI and the LSR to the LCSC.
11. If the LSR is complete and correct the LCSC will process the order for the loop, bill the ULM and issue an FOC to the CLEC.
12. The requested loop type will be provisioned through the ordering & provisioning systems according to the targeted intervals stated in the Interval section of this document.

Loop Order without prior LMU & FRN

This scenario is for an ADSL or HDSL compatible loop and the CLEC has not requested prior LMU & FRN. The non-recurring rate for the loop in this scenario will include the cost of the manual service inquiry and FRN.

Steps

1. CLEC prepares a firm order SI and LSR for a specific loop type (ADSL or HDSL).
2. CLEC sends the SI and LSR to its BellSouth CRSG/Account Team Representative.
3. CRSG/Account Team Representative holds the LSR and sends the SI to Outside Plant Engineering (OSPE).
4. **If the requested loop type facility is available**, OSPE completes the SI with the FRN facility and sends the SI back to the CRSG/Account Team Representative. **(proceed to step 10)**
5. **If the requested loop facility is not available but can be provided with modifications**, OSPE will indicate on the SI that the facility is not available but could be provided with a job for Unbundled Loop Modification (ULM). OSPE will return the SI to the CRSG/Account Team Representative. **(proceed to step 7)**
6. **If the requested loop type facility is not available and cannot be provided with modifications**, refer to the Note below.
7. The CRSG/Account Team Representative forwards the SI to the CLEC for the CLEC's approval for Unbundled Loop Modification (ULM). CLEC will indicate its approval for ULM by placing a check (✓) for ULM-LC and ULM-BT on the SI and then return the SI to CRSG/Account Team Representative.
8. The SI is returned to OSPE who will initiate a job for Unbundled Loop Modification. OSPE will provide the job number and estimated completion date (ECD) on the SI and return the SI to the CRSG/Account team.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Ordering & Provisioning (continued)

9. The OSPE job will do the loop modifications necessary to bring the loop facility to design standards for the requested loop type. The job will also include a FRN for the facility to be modified if the pair being modified is a spare pair.
10. Once the job is complete, OSPE will send the completed SI with job completion date to the CRSG/Account Team Representative.
11. CRSG/Account Team Representative forwards the SI & LSR to the LCSC.
12. If the LSR is complete and correct, the LCSC will process the order and issue an FOC to the CLEC.
13. The requested loop type will be provisioned through the ordering & provisioning systems according to the targeted intervals stated in the Interval section of this document.

Note: There may be several reasons for the unavailability of compatible facilities for the loop type being ordered by the CLEC. The OSPE will indicate which reason applies on the Service Inquiry (SI). Below is a brief synopsis of those reasons. For additional information regarding possible options to remedy the "facility unavailable" situation, please contact your BellSouth CRSG/Account Team Representative.

- **Facilities are out of range** – OSPE will indicate why the loop is out of range and cannot be provided on the SI. If the facility would qualify for a different loop type, the possible loop type will also be indicated. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC.
- **No compatible facilities/available by a job** – OSPE indicates that the facilities will be made available by a job and Special Construction (SC) is not applicable. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC. The SI will state an estimated completion date (ECD). The job will be completed before the service orders are issued.
- **No compatible facilities/available w/SC** – OSPE indicates that the facilities could be made available by a job and Special Construction (SC) is applicable. OSPE will describe the SC work in the comments section of the SI. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC. CLEC can then make the decision whether or not to pursue the SC process. If the CLEC decides to move forward with the SC process, the CLEC will be responsible for costs associated with BellSouth providing the quote and for the costs of implementing the SC job.
- **No compatible facilities/available with LST/CDP** – OSPE indicates that the facilities may be made available through Line and Station Transfers (LSTs) or by clearing a defective pair (CDP). OSPE will include remarks in the "comments" section of the SI that the facilities are not immediately available but an attempt will be made to make facilities available via cuts (LSTs) or CDP. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Service Order Requirements

Local Service Request (LSR) form

The CLEC will complete a Local Service Request (LSR) form according to the **BellSouth Ordering Guide for CLECs** (Local Service Ordering Guidelines, version 2 (LSOGv2)) or the **BellSouth Business Rules for Local Ordering** (Local Service Ordering Guidelines, version 4 (LSOGv4)).

The following information that is unique to ADSL/HDSL is also required on the LSR:

LSR Field	Information Required			
NC/NCI	Loop Type	NC	NCI* at CLEC	SEC NCI * at End User
	2 Wire ADSL	LXR-	02QB9.00A	02DU9.00A
	2 Wire HDSL	LXC-	02QB9.00H	02DU9.00H
	4 Wire HDSL**	LXC-	04QB9.00H	04DU9.00H
RMKS	FRN (if Loop Make-up and FRN ordered prior to placing loop order)			
Project	If Unbundled Loop Modification is ordered, populate with the following" <ul style="list-style-type: none"> • ULMCLC – for Load Coil removal • ULMBT – for Bridge Tap removal • ULMBTLC – for Load Coil and Bridge Tap removal 			

* "0" is a numeric zero character

** Orders for 4 Wire HDSL must include two CLEC cable and pairs on the LSR.

Service Inquiry (SI) form

A Service Inquiry is required, dependent on the ordering scenarios described in the **Ordering & Provisioning** section, for ordering an ADSL/HDSL compatible loop. See attached "**Service Inquiry**" and "**Instructions for Preparing Service Inquiry**" section for preparation instructions.

LSR & SI Transmittal

- CLEC sends the firm order SI and a LSR to a CRSG/Account Team Representative.
- The primary method of submission to the CRSG is through email. Refer to "**Guidelines for Interfacing with the CRSG UNE Group**" section for the submission requirements.
- CLEC should contact its BellSouth Account Team Representative for additional information regarding transmittal of SI and LSR if CRSG Representative is not known.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Rate Elements & USOCs

Rates for ADSL and HDSL compatible loops will need to be included in your contract. Rates may be interim and subject to true-up pending approval of final rates by the respective State Commissions. Commission orders will specify the dates back to which true-ups are applicable.

Rate Element	USOC
2 Wire Unbundled ADSL compatible loop, includes manual service inquiry and facility reservation	UAL2X
2 Wire Unbundled ADSL compatible loop, without manual service inquiry and facility reservation	UAL2W
2 Wire Unbundled HDSL compatible loop, includes manual service inquiry and facility reservation	UHL2X
2 Wire Unbundled HDSL compatible loop, without manual service inquiry and facility reservation	UHL2W
4 Wire Unbundled HDSL compatible loop, includes manual service inquiry and facility reservation	UHL4X
4 Wire Unbundled HDSL compatible loop, without manual service inquiry and facility reservation	UHL4W
Order Coordination – Time Specific (per order)	OCOSL

Other Non-Recurring Charges

Expedite Charge – applies if CLEC requests order interval of less than five days.

Manual Service Order – applies if order is manually submitted and electronic ordering is available

Order Cancellation – applies if the CLEC cancels an order. This charge is for work associated with provisioning either ADSL or HDSL loop pairs at the time the CLEC cancels an order.

Service Order Modification Charge – Applies if the CLEC modifies a service order after the Firm Order Confirmation has been issued.

Overtime Charge – Applies for work requested outside of normal working hours.

Time & Material – Applies for dispatch out if "no trouble found"

BellSouth Unbundled ADSL/HDSL Compatible Loops

Intervals

Where facilities are available and after any ULM request and/or SI process has been completed, it is expected that BellSouth will provision these loops after the receipt of an accurate LSR and SI within the following targeted intervals:

Loops	Intervals	FOC
1-5 Loops	7 business days	2 business days
6-14 Loops	10 business days	3 business days
15 + Loops	Handled on a project basis, intervals to be negotiated	

Maintenance & Repair Procedures

The CLEC is responsible for testing and pre-screening any trouble conditions to make sure the trouble is with ADSL/HDSL compatible loop pair before calling BellSouth. If the CLEC's testing isolates the repair problem to BellSouth's unbundled loop, the CLEC should notify the Unbundled Network Element (UNE) Center. The target interval for maintenance resolution is 24 hours from the time the trouble is reported to the UNE center.

The CLEC must provide the following information to UNE Center when reporting a repair problem:

- ADSL/HDSL pair Circuit ID
- Description of the trouble

If BellSouth dispatches a technician on a CLEC reported trouble call and no ADSL /HDSL loop trouble is found, BellSouth will charge the CLEC for time spent on the dispatch and for time spent testing the ADSL or HDSL compatible loop.

BellSouth Unbundled ADSL/HDSL Compatible Loops

Contract Specific Provisions

Before any ADSL/HDSL compatible loop can be ordered, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for each loop type that is being requested. This agreement must be in effect for all states where the CLEC plans to order these unbundled loops.

The information contained herein applies to the ADSL/HDSL compatible loop general offering and is part the standard BellSouth agreement. The general offering is in accordance with BellSouth policies, procedures and regulatory obligations as well as the Standard Interconnection Agreement.

The general offering does not address specific contract issues within a CLEC's Interconnection Agreement that may be different from the general offering. Where specific contract issues differ from the information provided here, the contract provisions will prevail for the term of the specific CLEC Interconnection Agreement. Otherwise, the general offering provisions will apply.

Service Inquiry

General Information:

UDL-2W/ADSL, UDL-2W/HDSL, UDL-4W/HDSL or UCL Service Inquiry

SI # (PON Num.) _____ Firm Order _____ Change _____ Cancel _____
Negotiator _____

CRSG EMAIL ADDRESS: (CRSG UNE/m5,mail5a) Negotiator Telephone Number _____

Customer Information:

CLEC Name _____ Customer Contact/Telephone number _____
Service Address _____ Local Serving Central Office _____
_____ Number of lines requested¹ _____
_____ Due Date/Requested Service Date _____

(To be filled out by Account team/CRSG should SC job be required)

Does the CLEC agree to SC quote billing? _____ YES (OSPE will prepare SC quote) _____ NO (OSPE will take no further action)

Date CLEC contacted about SC quote billing: _____

Actual Completion Date of OSPE EWO: _____ (OSPE to fill out and return to CRSG when EWO completes for options 3 & 4.)

¹ Indicate the number of loops requested. Fill out one "CLEC Loop Request" section for each loop requested. Use Page 2 of SI for this purpose.

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

² Checking off ULM-LC will remove all load coils, checking ULM-BT will remove sufficient BT to bring the loop to loop specifications as published in TR73600. The CLEC may request that specific bridged taps be removed in the "Comments" section. The CLEC can use the makeup previously supplied via manual or mechanized process to indicate which taps to remove.

³ The CLEC will provide the FRNs previously obtained for loops to be modified. Four wire loops will have two FRNs. If this field is filled in the CLEC is requesting loop modifications to pairs previously reserved. OSPE will respond with number #3 below, possibly with #4 if SC is applicable.

Outside Plant Engineering Facility Reservation Pass: One of the following five selections must be filled out:

1. _____ YES OSP Facilities are Available/reserved for 10 days FRN: _____
Cable and Pair(s) _____
2. _____ NO CANNOT PROVIDE. Check here if facilities are out of design range or in an area where copper pairs are not available and cannot be provided.
3. _____ NOT Available but can be provided with a job, no special construction. Job Number: _____
What is the expected completion date (ECD): _____
4. _____ NOT Available but can be provided with a job, special construction is applicable.⁴
5. _____ Facilities are not immediately available, will supply by one of the following: _____ CDP _____ LST
(List facilities involved in Comments section if available)

⁴ Provide a description of the work required in the "Comments" section. The CLEC can use this information to determine if they want to pursue a quote of SC charges. If the CLEC agrees to the SC quote billing conditions, OSPE will return an "Authorization Letter" which will contain a detailed description of the work and the total billable amount. The completion interval and job number will be supplied on the job quote.

Comments (describe work required on job, exceptions, etc.)

Prepared by (Facility Engineer) _____ Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred. Revised 07-21-00

Service Inquiry (continued)

General Information:

Page 2 of 2

UDL-2W/ADSL, UDL-2W/HDSL, UDL-4W/HDSL or UCL Service Inquiry

SI # (PON Num.) _____

Firm Order _____

Change _____

Cancel _____

Negotiator _____

CRSG EMAIL ADDRESS: (CRSG UNE/m5,mail5a) Negotiator Telephone Number _____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

Comments (describe work required on job, exceptions, etc.)

Prepared by (Facility Engineer) _____

Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred. Revised 07-21-00

BellSouth Unbundled ADSL/HDSL Compatible Loops

Instructions for Preparing Service Inquiry

Below are the fields of information the CLEC must provide when preparing the ADSL/HDSL Service Inquiry (SI). Unless otherwise noted, there are no restrictions regarding length of fields or alpha/numeric makeup of required information.

General Information

- SI# (PON Number)
- Check (✓) if Firm Order, Change or Cancel
- Negotiator Name (BellSouth CRSG/Account Team Representative)
- Negotiator's Tel Number

Customer Information

- CLEC Company Name
- Service Address**
- Customer Contact/Telephone number (CLEC contact)
- Local Serving Central Office (eight character CLLI for Central Office)
- Number of Lines requested
- Due Date/Requested Service Date

****NOTE:** End user's full and complete mailing service address, which would include any dept/floor/suite/room/apartment number, as well as, the U.S. postal zip code

CLEC Loop Request

- Check (✓) if a conversion
- Existing Telephone Number/Circuit ID – provide if conversion is checked
- Check (✓) each loop type requested. If multiple loops are requested, fill out one "CLEC Loop Request" section for each loop requested. Check ULM-LC if removal of load coils is requested.
- Check (✓) ULM-BT if removal of bridged tap is requested (BellSouth will remove BT(s) to meet ADSL or HDSL specifications; or the CLEC may request a specific BT removal by can indicating the specific BTs to be removed in the **Comments** section.)

BellSouth Unbundled ADSL/HDSL Compatible Loops**Instructions for Preparing Service Inquiry (*continued*)**

Below is information provided by BellSouth on the SI:

Customer Information

CRSG/Account Team Representative will fill out the Special Construction (SC) fields (if necessary) depending on SC action decided by the CLEC.

Outside Plant Engineering Facility (OSPE) Reservation Pass

If facilities are available, OSPE will check (✓) off item one (1) in this section and populate (FRN) (if the CLEC has not provided FRN previously obtained from Loop Make-Up request).

If facilities are not available, OSPE will check (✓) appropriate item number.

If facilities are not available but can be provided with Unbundled Loop Modification (ULM), OSPE will check (✓) item number 3 and provide an estimated completion date. OSPE will indicate ULM is required and provide an FRN in the Comments section. (SI will be returned to the CRSG/Acct. Team for the CLEC to approve ULM)

BellSouth Unbundled ADSL/HDSL Compatible Loops

Guidelines for Interfacing with the CRSG UNE Group

For Email Transactions

- In order to serve customers as efficiently as possible, the CLEC should communicate with the CRSG UNE Group via email, whenever possible. New orders, CLEC initiated corrections, and clarification responses should be submitted via email.
- The CRSG UNE Group email address is crsg.une@bridge.bellsouth.com.
- When submitting the request via email, submit only 1 PON (SI & LSR) per mail message
- Use the following guidelines in formatting the email subject header:

PON 12345 UNE NEW	for a new UNE order
PON 12345 LSOD NEW	new Line Share Splitter request
PON 12345 CORRECTION	for a CLEC initiated correction or update
PON 12345 CLARIFICATION RESPONSE	for a clarification response
PON 12345 STATUS	for a status request

For Facsimile Transactions

- Requests submitted via facsimile should be sent to 800-365-8108
- The following guidelines should be used for requests submitted via facsimile:
 - The request must be type written
 - A transmittal cover page must be used
 - The transmittal cover should include
 - PON Number(s)
 - Total number of pages transmitted
 - Contact information

BellSouth Unbundled ADSL/HDSL Compatible Loops**Acronyms**

ADSL	Asymmetrical Digital Subscriber Line
CDP	Clear Defective Pair
CLEC	Competitive Local Exchange Carrier
CLLI	Common Language Location Identifier
CRSG	Complex Resale Support Group
DLC	Digital Loop Carrier
DLR	Design Layout Record
DSLAM	Digital Subscriber Line Access Multiplexer
ECD	Estimated Completion Date
EE	Enhanced Electronic
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High Bit Rate Digital Subscriber Line
ID	Identification
LCSC	Local Carrier Service Center
LMU	Loop Make-up
LSOGv2	Local Service Ordering Guidelines version 2
LSOGv4	Local Service Ordering Guidelines version 4
LSR	Local Service Request
LST	Line & Station Transfer
MDF	Main Distribution Frame
NC	Network Channel
NCI	Network Channel Interface
NID	Network Interface Device
OBF	Ordering & Billing Forum
OC	Order Coordination
OSPE	Outside Plant Engineering
PON	Purchase Order Number
RRD	Revised Resistance Design
SC	Special Construction
SECNCI	Secondary Network Channel Interface

BellSouth Unbundled ADSL/HDSL Compatible Loops**Acronyms (continued)**

SI	Service Inquiry
TR73600	Technical Reference 73600
UCL/L	Unbundled Copper Loop/Long
UCL/S	Unbundled Copper Loop/Short
ULM	Unbundled Loop Modification
ULM-BT	Bridged Tap
ULM-LC	Load Coil
UNE	Unbundled Network Element
USOC	Universal Service Order Code

EXHIBIT WGL-3

BellSouth Unbundled Copper Loop

BellSouth Unbundled Copper Loop

Unbundled Copper Loop

***CLEC
Information Package***

(Version 3)

BellSouth Unbundled Copper Loop

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BellSouth Unbundled Copper Loop

Introduction & Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the UNE described herein. Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Web site.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

BellSouth Unbundled Copper Loop

Revisions

Version 3

- 1) Page 1 – “Version 3” replaces “Version 2”.
- 2) Footnote on each page – date changed from “8/25/00” to “10/13/00” and “Version 2” changed to “Version 3”.
- 3) **Service Order Requirements section – LSR form sub-section:**
 - Added “Project” under the **LSR Field**
 - Under the “**Information Required**” column added “If Unbundled Loop Modification is ordered, populate with the following:
 - ULMMLC – for Load Coil removal
 - ULMBT – for Bridge Tap removal
 - ULMBTLC – for Load Coil and Bridge Tap removal”

Version 2

1. Page 1 – added “Version 2”.
2. Footnote on each page – date changed from 3/10/00 to 8/25/00. Deleted “UCLpkg.doc” and added “Version 2”.
3. The version 1 **Ordering and Provisioning** and **Service Inquiry (SI) Process** sections were replaced with a new **Ordering and Provisioning** section that contains three ordering scenarios.
4. **Service Order Requirements section:**
 - **LSR form sub-section** – In first paragraph, deleted Ordering and Billing Forum (OBF) guidelines reference and replace with “**BellSouth Ordering Guide for CLECs** (LSOGv2) or the **BellSouth Business Rules for Local Ordering** (LSOGv4))”.
 - **LSR form sub-section** – In first paragraph, deleted last sentence.
 - **LSR form sub-section** – second paragraph, added clarification for “NCI at CLEC” and “SEC NCI at End User” codes format:
 - “0” is a numeric zero character
 - ** “O” is an alpha (letter O)
 - **LSR form sub-section** – second paragraph, under LSR Field, added additional field “RMKS”. Under Information Required, added “FRN (if Loop Make-up and FRN ordered prior to placing loop order)”.
5. **Rate Elements and USOCs** section -- updated to reflect description changes in the existing elements and to add new elements:

BellSouth Unbundled Copper Loop

Old Element	New Description/Element	USOC
2 Wire Unbundled Copper Loop/S, ≤ 18kft	2 Wire UCL/S, ≤ 18kft, <u>includes</u> manual service inquiry and facility reservation	UCLPB
NA	2 Wire UCL/S, ≤ 18kft, <u>without</u> manual service inquiry and facility reservation	UCLPW
4 Wire Unbundled Copper Loop/S, ≤ 18kft	4 Wire UCL/S, ≤ 18kft, <u>includes</u> manual service inquiry and facility reservation	UCL4S
NA	4 Wire UCL/S, ≤ 18kft, <u>without</u> manual service inquiry and facility reservation	UCL4W
2 Wire Unbundled Copper Loop/L, > 18kft	2 Wire UCL/L, > 18kft, <u>includes</u> manual service inquiry and facility reservation	UCL2L
NA	2 Wire UCL/L, > 18kft, <u>without</u> manual service inquiry and facility reservation	UCL2W
4 Wire Unbundled Copper Loop/L, > 18kft	4 Wire UCL/L, > 18kft, <u>includes</u> manual service inquiry and facility reservation	UCL4L
NA	4 Wire UCL/L, > 18kft, <u>without</u> manual service inquiry and facility reservation	UCL4O

Revisions (continued)

6. Service Inquiry (SI) Form (revised: 2/29/00) and SI Preparation replaced with new Service Inquiry (revised: 7/21/00) and Instructions for Preparing Service Inquiry.
7. Added an Acronyms section

BellSouth Unbundled Copper Loop

Service Description

The Unbundled Copper Loop is a dedicated metallic transmission facility from BellSouth's Main Distribution Frame (MDF) to a customer's premises. This loop is commonly referred to as a "dry copper" loop because it does not have any intervening equipment such as load coils, repeaters, etc., between the end user premises and the Serving Wire Center (SWC). BellSouth offers 2 & 4 Wire UCL/S (Short) and 2 & 4 Wire UCL/L (Long). The UCL/S is any Resistance Design (RD) copper loop that is less than or equal to 18 kilofeet (kft). The UCL/L will be any copper loop that is longer than 18kft.

These loops are not intended to support any particular service and may be utilized by the CLEC to provide a wide-range of telecommunications services so long as those services do not adversely effect BellSouth's network. This facility will include a Network Interface Device (NID) or equivalent demarcation point at the end-user's customer's location for the purpose of connecting the loop to the customer's inside wire.

Service Capabilities

BellSouth will only provide the loop facilities with these offerings.

UCL loops will be designed circuits and are provisioned with test points. BellSouth will provide a Design Layout Record (DLR).

BellSouth will perform installation testing (other than switch-based) that is needed to ensure the loop meets the specifications of **BellSouth's TR73600**.

At the CLEC's option and for an additional charge, BellSouth will perform order coordination (OC) activities associated with Number Portability and/or disconnect orders. OC is intended to convert an existing customer to a new local service provider using the UCL in a manner that minimizes the end-user's dial-tone interruption. BellSouth will notify the CLEC of the appropriate conversion time and will then perform the work within the negotiated interval.

If the CLEC requests work after normal working hours, overtime rates will apply for work outside of 8:00 a.m. to 5:00 p.m. local time

If the CLEC's end user has existing service with BellSouth that utilizes a compatible copper loop, and wants to change local service providers, BellSouth will attempt to reuse the end user's existing loop.

BellSouth Unbundled Copper Loop

Technical Requirements

The UCL/S will be a Resistance Design (RD) loop of 1300 ohms or less and will consist of non-loaded copper with a total length of 18 kft or less. In addition, up to 6 kft of bridged tap may be included on the loop facility.

The UCL/L is a loop of up to 2800 ohms and will consist of non-loaded copper with a total length greater than 18 kft. In addition, up to 12 kft of bridged tap may be included on the loop facility. All copper loops longer than 18kft within BellSouth's network typically will have load coils or other intervening equipment. Therefore, the CLEC may have to request Unbundled Loop Modification (ULM).

For a CLEC requested loop facility that does not meet UCL specifications and it is determined that the loop can be modified to meet these specifications, the CLEC may request that BellSouth's **Unbundled Loop Modification (ULM)**. In these situations and as a chargeable option, BellSouth will use the ULM process to modify the requested loop facility to UCL specifications. Additionally, the ULM product must be utilized to remove any bridged tap sections that are requested by the CLEC. The rates for ULM are in addition to the UCL rate.

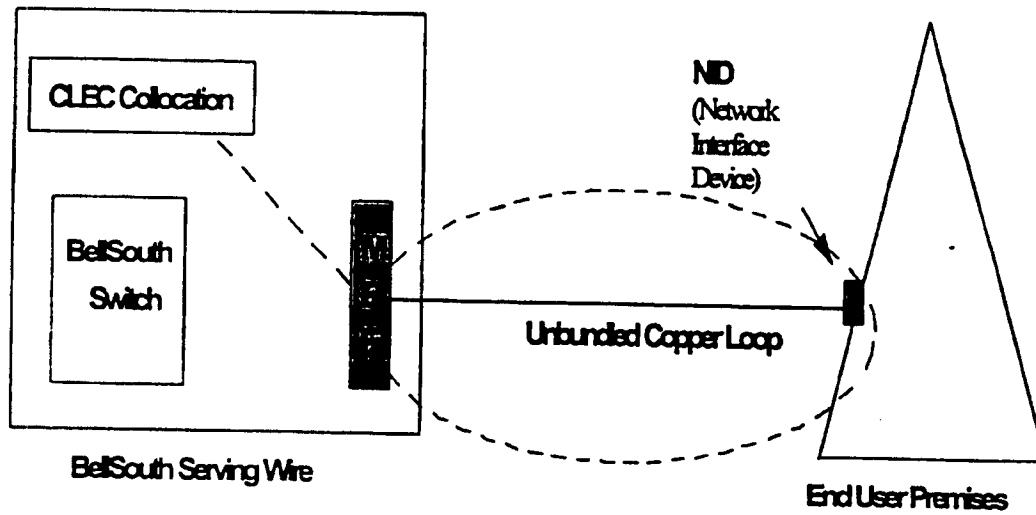
BellSouth will only ensure that the UCL has electrical continuity and provides balance relative to tip and ring.

These loops are not designed or intended to provide any particular service. The loop may be attached to a variety of equipment both at the CLEC's collocation space and the end user premises. BellSouth does not guarantee a particular bit rate associated with these loops.

UCL will meet the parameters specified in **Technical Reference (TR) 73600**.

BellSouth Unbundled Copper Loop

Network Configuration



BellSouth Unbundled Copper Loop

Ordering & Provisioning

This section will describe ordering scenarios available to the CLEC for UCL ordering. It is important to note that it is now possible for a CLEC to obtain Loop Make-up (LMU) prior to placing an order for a UCL. This option will be referred to as "prior LMU".

There is a key distinction in the "with prior LMU" and the "without prior LMU" scenario. "With prior LMU" indicates that LMU was ordered and obtained by the CLEC prior to placing the UCL order; whereas "without prior LMU" indicates that the LMU look-up and facility reservation function will be handled as *part of* the loop ordering process. Lastly, Service Inquiry (SI) forms for LMU are distinct and separate from the SI forms required in the submission of a CLEC's UCL service order.

The LMU with Facility Reservation Number (FRN) option enables the CLEC to receive LMU and reserve a loop facility. This allows the CLEC a limited time span (*4 days*) to place an UCL order using the pre-order LMU. For additional detail regarding the LMU/FRN process, refer to the **LMU Product Package**.

If a prior LMU/FRN is obtained, the CLEC may use the FRN facility once it later submits a Local Service Request (LSR) to order a UCL. However, it should be noted that the specific loop type ordered on the LSR must match the specifications of the facility for which prior LMU/FRN has been requested. BellSouth will use best efforts to assign the reserved facility on which the CLEC has obtained the FRN. If the loop type the CLEC has ordered on the LSR form does not match the reserved facility, the provisioning system will not use the reserved facility. Instead, the provisioning system will automatically override the FRN and attempt to assign a facility that does match the specifications of the loop type ordered. For information regarding the technical specifications refer to the Technical Requirements section of this document or to the **BellSouth TR73600**.

The sub-sections on the following pages describe the various ordering scenarios:

BellSouth Unbundled Copper Loop

Ordering & Provisioning (continued)

Loop Order with prior Loop Make-Up (LMU) and Facility Reservation Number (FRN)

The CLEC in this scenario would have requested a LMU with FRN prior to placing an order for the UCL. In this scenario the CLEC does not require and is not ordering Unbundled Loop Modification (ULM) on the requested loop facility. The non-recurring rate for the UCL in this scenario excludes the cost of the manual service inquiry LMU and FRN since the CLEC has previously paid for the LMU with FRN.

Steps

1. CLEC requests and receives LMU/FRN through the **LMU process**.
2. CLEC prepares and sends a Local Service Request (LSR) form w/FRN to the Local Carrier Service Center (LCSC). CLEC must specify UCL on the LSR.
3. Once a complete and correct LSR has been processed, the LCSC will forward a Firm Order Confirmation (FOC) to the CLEC.
4. The requested loop type will be provisioned through the ordering and provisioning systems according to the targeted intervals stated in the Interval section.

Loop Order with prior LMU & FRN and with Unbundled Loop Modification (ULM)

This scenario is for a UCL for which the CLEC is requesting **ULM**. The CLEC would have also requested a LMU with FRN prior to requesting the loop with ULM. The non-recurring rate for the loop in this scenario excludes the cost of the manual service inquiry LMU and FRN since the CLEC has previously paid for the LMU with FRN. Rates for ULM will be charged to the CLEC as separate rate elements.

Steps

1. CLEC requests and receives LMU/FRN through the **LMU process**.
2. CLEC prepares a firm order Service Inquiry (SI) and must specify UCL, the required modifications and the FRN of the facility which requires modification.
3. CLEC prepares the LSR for the requested loop type with FRN.
4. CLEC sends the SI and LSR to its BellSouth CRS/Account Team Representative.
5. CRS/Account Team Representative holds the LSR and sends the SI to Outside Plant Engineering (OSPE).
6. OSPE issues an engineering job for the requested Alms and determines an estimated completion date (ECD) for completing the modifications.
7. OSPE forwards the SI with ULM ECD to the CRS/Account Team Representative.

BellSouth Unbundled Copper Loop

Ordering & Provisioning (continued)

8. CRSG/Account Team Representative notifies the CLEC of the ULM ECD.
9. When ULM is complete, OPSE notifies the CRSG/Account Team Representative who in turn notifies the CLEC.
10. CRSG/Account Team Representative forwards the SI and the LSR to the LCSC.
11. If the LSR is complete and correct the LCSC will process the order for the loop, bill the ULM and issue an FOC to the CLEC.
12. The requested loop type will be provisioned through the ordering & provisioning systems according to the targeted intervals stated in the Interval section of this document.

Loop Order without prior LMU & FRN

This scenario is for a UCL and the CLEC has not requested prior LMU & FRN. The non-recurring rate for the loop in this scenario will include the cost of the manual service inquiry and FRN.

Steps

1. CLEC prepares a firm order SI and LSR for a UCL.
2. CLEC sends the SI and LSR to its BellSouth CRSG/Account Team Representative.
3. CRSG/Account Team Representative holds the LSR and sends the SI to Outside Plant Engineering (OSPE).
4. If thy UCL facility is available, OSPE completes the SI with the FRN facility and sends the SI back to the CRSG/Account Team Representative. (proceed to step 10)
5. If the UCL facility is not available but can be provided with modifications, OSPE will indicate on the SI that the facility is not available but could be provided with a job for Unbundled Loop Modification (ULM). OSPE will return the SI to the CRSG/Account Team Representative. (proceed to step 7)
6. If the requested loop type facility is not available and cannot be provided with modifications, refer to the Note below.
7. The CRSG/Account Team Representative forwards the SI to the CLEC for the CLEC's approval for Unbundled Loop Modification (ULM). CLEC will indicate its approval for ULM by placing a check (✓) for ULM-LC and ULM-BT on the SI and then return the SI to CRSG/Account Team Representative.
8. The SI is returned to OSPE who will initiate a job for Unbundled Loop Modification. OSPE will provide the job number and estimated completion date (ECD) on the SI and return the SI to the CRSG/Account team.

BellSouth Unbundled Copper Loop

Ordering & Provisioning (continued)

9. The OSPE job will do the loop modifications necessary to bring the loop facility to design standards for a UCL. The job will also include a FRN for the facility to be modified if the pair being modified is a spare pair.
10. Once the job is complete, OSPE will send the completed SI with job completion date to the CRSG/Account Team Representative.
11. CRSG/Account Team Representative forwards the SI & LSR to the LCSC.
12. If the LSR is complete and correct, the LCSC will process the order and issue an FOC to the CLEC.
13. The UCL will be provisioned through the ordering & provisioning systems according to the targeted intervals stated in the Interval section of this document.

Note: There may be several reasons for the unavailability of compatible facilities for the loop type being ordered by the CLEC. The OSPE will indicate which reason applies on the Service Inquiry (SI). Below is a brief synopsis of those reasons. For additional information regarding possible options to remedy the "facility unavailable" situation, please contact your BellSouth CRSG/Account Team Representative.

- **Facilities are out of range** – OSPE will indicate why the loop is out of range and cannot be provided on the SI. If the facility would qualify for a different loop type, the possible loop type will also be indicated. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC.
- **No compatible facilities/available by a job** – OSPE indicates that the facilities will be made available by a job and Special Construction (SC) is not applicable. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC. The SI will state an estimated completion date (ECD). The job will be completed before the service orders are issued.
- **No compatible facilities/available w/SC** – OSPE indicates that the facilities could be made available by a job and Special Construction (SC) is applicable. OSPE will describe the SC work in the comments section of the SI. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC. CLEC can then make the decision whether or not to pursue the SC process. If the CLEC decides to move forward with the SC process, the CLEC will be responsible for costs associated with BellSouth providing the quote and for the costs of implementing the SC job.
- **No compatible facilities/available with LST/CDP** – OSPE indicates that the facilities may be made available through Line and Station Transfers (LSTs) or by clearing a defective pair (CDP). OSPE will include remarks in the "comments" section of the SI that the facilities are not immediately available but an attempt will be made to make facilities available via cuts (LSTs) or CDP. The SI will be returned to the CRSG/Account Team Representative to advise the CLEC.

BellSouth Unbundled Copper Loop

Service Order Requirements

Local Service Request (LSR) form

The CLEC will complete a Local Service Request (LSR) form according to the **BellSouth Ordering Guide for CLECs (LSOGv2)** or the **BellSouth Business Rules for Local Ordering (LSOGv4)**.

The following information that is unique to UCL is also required on the LSR:

LSR Field	Information Required			
NC/NCI	Loop Type	NC	NCI at CLEC*	SEC NCI at End User*
	2 Wire UCL/S (≤ 18 kft)	LX-N	02QC3.OOF	02NO2
	4 Wire UCL/S (≤ 18 kft)	LX-N	04QC3.OOF	04NO2
	2 Wire UCL/L (> 18 kft)	LX-	02QC3.OOF	02NO2
	4 Wire UCL/L (> 18 kft)	LX-	04QC3.OOF	04NO2
RMKS	FRN (if Loop Make-up and FRN ordered prior to placing loop order)			
Project	If Unbundled Loop Modification is ordered, populate with the following: <ul style="list-style-type: none"> • ULMCLC – for Load Coil removal • ULMBT – for Bridge Tap removal • ULMBTLC – for Load Coil and Bridge Tap removal 			

- * "0" is a numeric zero character
- * "O" is an alpha (letter O)

Service Inquiry (SI) form

A Service Inquiry is required, dependent on the ordering scenarios described in the **Ordering & Provisioning** section, for ordering a UCL. See attached "**Service Inquiry**" and "**Instructions for Preparing Service Inquiry**" section for preparation instructions.

LSR & SI Transmittal

- CLEC sends the firm order SI and a LSR to a CRS/Account Team Representative.
- The primary method of submission to the CRS is through email. Refer to "**Guidelines for Interfacing with the CRS UNE Group**" section for the submission requirements.
- CLEC should contact its BellSouth Account Team Representative for additional information regarding transmittal of SI and LSR if CRS Representative is not known.

BellSouth Unbundled Copper Loop

BellSouth Unbundled Copper Loop

Rate Elements & USOCs

Rates for UCLs will need to be included in your contract. Rates may be interim and subject to true-up pending approval of final rates by the respective State Commissions. Commission orders will specify the dates back to which true-ups are applicable.

Rate Element	USOC
2 Wire UCL/S \leq 18kft, <u>includes</u> manual service inquiry and facility reservation	UCLPB
2 Wire UCL/S \leq 18kft, <u>without</u> manual service inquiry and facility reservation	UCLPW
4 Wire UCL/S \leq 18kft, <u>includes</u> manual service inquiry and facility reservation	UCL4S
4 Wire UCL/S \leq 18kft, <u>without</u> manual service inquiry and facility reservation	UCL4W
2 Wire UCL/L $>$ 18kft, <u>includes</u> manual service inquiry and facility reservation	UCL2L
2 Wire UCL/L $>$ 18kft, <u>without</u> manual service inquiry and facility reservation	UCL2W
4 Wire UCL/L $>$ 18kft, <u>includes</u> manual service inquiry and facility reservation	UCL4L
4 Wire UCL/L $>$ 18kft, <u>without</u> manual service inquiry and facility reservation	UCL4O
Order Coordination (per loop)	UCLMC

Other Non-Recurring Charges

Manual Service Order – applies if order is manually submitted and electronic ordering is available.

Order Cancellation – applies if the CLEC cancels an order. This charge is for work associated with provisioning UCL pairs at the time the CLEC cancels an order.

Service Order Modification Charge – applies if the CLEC modifies a service order after the Firm Order Confirmation has been issued.

Overtime Charge – applies for work requested outside of normal working hours.

Time & Material – applies for dispatch out if “no trouble found”

BellSouth Unbundled Copper Loop

Intervals

Where facilities are available and after any ULM request and/or SI process has been completed, it is expected that BellSouth will provision these loops after the receipt of an accurate LSR and SI within the following targeted intervals:

Loops	Intervals	FOC
1-5 Loops	7 business days	2 business days
6-14 Loops	10 business days	3 business days
15 + Loops	Handled on a project basis, intervals to be negotiated	

Maintenance & Repair Procedures

The CLEC is responsible for testing and pre-screening any trouble conditions to make sure the trouble is with the UCL pair before calling BellSouth. If the CLEC's testing isolates the repair problem to BellSouth's unbundled loop, the CLEC should notify the Unbundled Network Element (UNE) Center. The target interval for maintenance resolution is 24 hours from the time the trouble is reported to the UNE center.

The CLEC must provide the following information to UNE Center when reporting a repair problem:

- UCL pair Circuit ID
- Description of the trouble

If BellSouth dispatches a technician on a CLEC reported trouble call and no UCL trouble is found, BellSouth will charge the CLEC for time spent on the dispatch and for time spent testing the UCL.

BellSouth Unbundled Copper Loop

Contract Specific Provisions

Before any UCL loop can be ordered, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for each loop type that is being requested. This agreement must be in effect for all states where the CLEC plans to order these unbundled loops.

The information contained herein applies to the UCL general offering and is part the standard BellSouth agreement. The general offering is in accordance with BellSouth policies, procedures and regulatory obligations as well as the Standard Interconnection Agreement.

The general offering does not address specific contract issues within a CLEC's Interconnection Agreement that may be different from the general offering. Where specific contract issues differ from the information provided here, the contract provisions will prevail for the term of the specific CLEC Interconnection Agreement. Otherwise, the general offering provisions will apply.

Service Inquiry

General Information:

UDL-2W/ADSL, UDL-2W/HDSL, UDL-4W/HDSL or UCL Service Inquiry

SI # (PON Num.) _____ Firm Order _____ Change _____ Cancel _____

Negotiator _____

CRSG EMAIL ADDRESS: (CRSG UNE/m5,mail5a) Negotiator Telephone Number _____

Customer Information:

CLEC Name _____

Customer Contact/Telephone number _____

Service Address _____

Local Serving Central Office _____

Number of lines requested¹ _____

Due Date/Requested Service Date _____

(To be filled out by Account team/CRSG should SC job be required)

Does the CLEC agree to SC quote billing? _____ YES (OSPE will prepare SC quote) _____ NO (OSPE will take no further action)

Date CLEC contacted about SC quote billing: _____

Actual Completion Date of OSPE EWO: _____ (OSPE to fill out and return to CRSG when EWO completes for options 3 & 4)

¹ Indicate the number of loops requested. Fill out one "CLEC Loop Request" section for each loop requested. Use Page 2 of SI for this purpose.

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

² Checking off ULM-LC will remove all load coils, checking ULM-BT will remove sufficient BT to bring the loop to loop specifications as published in TR73600. The CLEC may request that specific bridged taps be removed in the "Comments" section. The CLEC can use the makeup previously supplied via manual or mechanized process to indicate which taps to remove.

³ The CLEC will provide the FRNs previously obtained for loops to be modified. Four wire loops will have two FRNs. If this field is filled in the CLEC is requesting loop modifications to pairs previously reserved. OSPE will respond with number #3 below, possibly with #4 if SC is applicable.

Outside Plant Engineering Facility Reservation Pass: One of the following five selections must be filled out:

1. _____ YES OSP Facilities are Available/reserved for 10 days FRN: _____
Cable and Pair(s) _____
2. _____ NO CANNOT PROVIDE. Check here if facilities are out of design range or in an area where copper pairs are not available and cannot be provided.
3. _____ NOT Available but can be provided with a job, no special construction. Job Number: _____
What is the expected completion date (ECD): _____
4. _____ NOT Available but can be provided with a job, special construction is applicable.⁴
5. _____ Facilities are not immediately available, will supply by one of the following: _____ CDP _____ LST
(List facilities involved in Comments section if available)

⁴ Provide a description of the work required in the "Comments" section. The CLEC can use this information to determine if they want to pursue a quote of SC charges. If the CLEC agrees to the SC quote billing conditions, OSPE will return an "Authorization Letter" which will contain a detailed description of the work and the total billable amount. The completion interval and job number will be supplied on the job quote.

Comments (describe work required on job, exceptions, etc.)

Prepared by (Facility Engineer)

Telephone Number

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred. Revised 07-21-00

Service Inquiry (continued)

General Information:

Page 2 of 2

UDL-2W/ADSL, UDL-2W/HDSL, UDL-4W/HDSL or UCL Service Inquiry

SI # (PON Num.) _____ Firm Order _____ Change _____ Cancel _____

Negotiator _____

CRSG EMAIL ADDRESS: (CRSG UNE/m5,mail5a) Negotiator Telephone Number _____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

CLEC Loop Request: (CLEC requests the following loops to the above address with the indicated Loop Modifications:

_____ Check here if this is a conversion of existing service. Existing Telephone Number: _____

	Provide this loop	Provide ULM-LC ²	Provide ULM-BT ²	Existing CLEC FRNs ³
UDL-2W/ADSL	_____	_____	_____	_____
UDL-2W/HDSL	_____	_____	_____	_____
UDL-4W/HDSL	_____	_____	_____	_____
UCL/S-2W	_____	_____	_____	_____
UCL/S-4W	_____	_____	_____	_____
UCL/L-2W	_____	_____	_____	_____
UCL/L-4W	_____	_____	_____	_____

Comments (describe work required on job, exceptions, etc.)

Prepared by (Facility Engineer) _____ Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred. Revised 07-21-00

BellSouth Unbundled Copper Loop

Instructions for Preparing Service Inquiry

Below are the fields of information the CLEC must provide when preparing the UCL Service Inquiry (SI). Unless otherwise noted, there are no restrictions regarding length of fields or alpha/numeric makeup of required information.

General Information

- SI# (PON Number)
- Check (✓) if Firm Order, Change or Cancel
- Negotiator Name (BellSouth CRSG/Account Team Representative)
- Negotiator's Tel Number

Customer Information

- CLEC Company Name
- Service Address**
- Customer Contact/Telephone number (CLEC contact)
- Local Serving Central Office (eight character CLLI for Central Office)
- Number of Lines requested
- Due Date/Requested Service Date

****NOTE:** End user's full and complete mailing service address, which would include any dept/floor/suite/room/apartment number, as well as, the U.S. postal zip code

CLEC Loop Request

- Check (✓) if a conversion
- Existing Telephone Number/Circuit ID – provide if conversion is checked
- Check (✓) each loop type requested. If multiple loops are requested, fill out one "CLEC Loop Request" section for each loop requested. Check ULM-LC if removal of load coils is requested.
- Check (✓) ULM-BT if removal of bridged tap (BT) is requested (BellSouth will remove BT(s) to meet UCL or HDSL specifications; or the CLEC may request a specific BT removal by can indicating the specific BTs to be removed in the **Comments** section.)

BellSouth Unbundled Copper Loop

Instructions for Preparing Service Inquiry *(continued)*

Below is information provided by BellSouth on the SI:

Customer Information

CRSG/Account Team Representative will fill out the Special Construction (SC) fields (if necessary) depending on SC action decided by the CLEC.

Outside Plant Engineering Facility (OSPE) Reservation Pass

If facilities are available, OSPE will check (✓) off item one (1) in this section and populate (FRN) (if the CLEC has not provided FRN previously obtained from Loop Make-Up request).

If facilities are not available, OSPE will check (✓) appropriate item number.

If facilities are not available but can be provided with Unbundled Loop Modification (ULM), OSPE will check (✓) item number 3 and provide an estimated completion date. OSPE will indicate ULM is required and provide an FRN in the **Comments** section. (SI will be returned to the CRS/Account Team for the CLEC to approve ULM)

BellSouth Unbundled Copper Loop**Guidelines for Interfacing with the CRSG UNE Group****For Email Transactions**

- In order to serve customers as efficiently as possible, the CLEC should communicate with the CRSG UNE Group via email, whenever possible. New orders, CLEC initiated corrections, and clarification responses should be submitted via email.
- The CRSG UNE Group email address is crsg.une@bridge.bellsouth.com.
- When submitting the request via email, submit only 1 PON (SI & LSR) per mail message
- Use the following guidelines in formatting the email subject header:

PON 12345 UNE NEW	for a new UNE order
PON 12345 LSOD NEW	new Line Share Splitter request
PON 12345 CORRECTION	for a CLEC initiated correction or update
PON 12345 CLARIFICATION RESPONSE	for a clarification response
PON 12345 STATUS	for a status request

For Facsimile Transactions

- Requests submitted via facsimile should be sent to 800-365-8108
- The following guidelines should be used for requests submitted via facsimile:
 - < The request must be type written
 - < A transmittal cover page must be used
 - < The transmittal cover should include
 - PON Number(s)
 - Total number of pages transmitted
 - Contact information

BellSouth Unbundled Copper Loop**Acronyms**

ADSL	Asymmetrical Digital Subscriber Line
CDP	Clear Defective Pair
CLEC	Competitive Local Exchange Carrier
CLLI	Common Language Location Identifier
CRSG	Complex Resale Support Group
DLC	Digital Loop Carrier
DLR	Design Layout Record
DSLAM	Digital Subscriber Line Access Multiplexer
ECD	Estimated Completion Date
EE	Enhanced Electronic
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High Bit Rate Digital Subscriber Line
ID	Identification
LCSC	Local Carrier Service Center
LMU	Loop Make-up
LSOGv2	Local Service Ordering Guidelines version 2
LSOGv4	Local Service Ordering Guidelines version 4
LSR	Local Service Request
LST	Line & Station Transfer
MDF	Main Distribution Frame
NC	Network Channel
NCI	Network Channel Interface
NID	Network Interface Device
OBF	Ordering & Billing Forum
OC	Order Coordination
OSPE	Outside Plant Engineering
PON	Purchase Order Number
RRD	Revised Resistance Design

BellSouth Unbundled Copper Loop**Acronyms (continued)**

SC	Special Construction
SECNCI	Secondary Network Channel Interface
SI	Service Inquiry
TR73600	Technical Reference 73600
UCL/L	Unbundled Copper Loop/Long
UCL/S	Unbundled Copper Loop/Short
ULM	Unbundled Loop Modification
ULM-BT	Bridged Tap
ULM-LC	Load Coil
UNE	Unbundled Network Element
USOC	Universal Service Order Code

EXHIBIT WGL-4

**BellSouth Unbundled Copper Loop –
Non-Designed (UCL-ND)**

**CLEC
Information Package**

BellSouth Unbundled Copper Loop – Non-Designed

BellSouth Unbundled Copper Loop – Non-Designed (UCL-ND)

**CLEC
Information Package**

Version 1

BellSouth Unbundled Copper Loop – Non-Designed

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BellSouth Unbundled Copper Loop – Non-Designed

Introduction & Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the UNE described herein. Detailed ordering guidelines are provided in documents on the BellSouth Interconnection web site.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the Carrier Notification Process.

Please contact your BellSouth Account Manager if you have any questions about the information contained herein.

BellSouth Unbundled Copper Loop – Non-Designed

Service Description

Unbundled Copper Loop – Non-Designed (UCL-ND) will be provisioned as a dedicated 2- wire metallic transmission facility from BellSouth's Main Distribution Frame (MDF) to a customer's premises (including the NID).

UCL-ND will be a "dry copper" facility in that it will not have any intervening equipment such as load coils, repeaters, or Digital Access Main Lines ("DAMLs"). The UCL-ND loop may contain bridge tap of up to 6 Kft (exclusive of the loop length between the end user's premises and Serving Wire Center (SWC). UCL-ND typically will be 1300 Ohms resistance and in most cases will not exceed 18 Kft (18,000) feet in length, although UCL-ND will not have a specific length limitation. For loops less than 18 Kft and with less than 1300 Ohms resistance, the loop will provide a voice grade transmission channel suitable for loop start signaling and the transport of analog voice grade signals. UCL-ND will not be designed and will not be provisioned with either a Design Layout Record (DLR) or a test point.

If no compatible BellSouth facilities are available, the CLEC may utilize BellSouth's existing electronic Unbundled Loop Make-Up (LMU) process to screen and reserve facilities. If the CLEC uses the above process, they must provide the RESID/FRN information in the REMARKS section of the paper LSR (Local Service Request) form.

The CLEC may use BellSouth's Unbundled Loop Modification (ULM) process to remove bridge tap and or load coils from copper facilities in order to condition them as UCL-ND loops. Therefore, some loops that would not qualify as UCL-ND could be transformed into loops that do qualify by using the ULM process. The CLEC would send a request for the UCL-ND loop and any ULM requests, business as usual. These loops are not intended to support any particular services and may be utilized by the CLEC to provide a wide range of telecommunications services so long as these services comply with industry standards and do not adversely affect BellSouth's network.

CLEC may request, for an additional non-recurring charge, an Engineering Information (EI) document from BellSouth, which provides loop make up information, similar to a Design Lay Out Record (DLR). The CLEC must have the UCL-ND and EI in their CLEC contract, before they submit an order for these items. If not in the CLEC contract, the CLEC must contact their BellSouth negotiator to amend their contract.

BellSouth Unbundled Copper Loop – Non-Designed

Service Capabilities

UCL-ND will be terminated at the Central Office (CO) in the following manner:

1. They will be delivered to the CLEC at their collocation space via a cross - connect. This cross-connect element will be provisioned out of the Collocation offering. Once this connection is made, the CLEC will provide the equipment and/or transport needed to provide the desired service to their end user.
2. If either of these loops is already connected to another UNE (Unbundled Network Element) (e.g., interoffice transport, unbundled local switching, etc.) they may remain connected to that element if the CLEC orders a combined UNE that includes the UCL-ND. BellSouth will not combine UCL-ND with any other UNE if the UCL-ND is not already combined with that element.

Once the service order has been processed via the (Local Carrier Service Center) LCSC Service Rep or via Electronic Interface, the service order will flow to Address and Facility Inventory Group (AFIG) for verification of CLEC CA/PR and to assign BellSouth facilities for CKL 2 location. Service order will flow to CO to be wired, then to Work Maintenance Center (WMC) for a possible dispatch to the field. Service order is then routed to the UNE CWIN (Customer Wholesale Interconnection Network Services) Center for coordination and turn up of service.

If facilities are not available, the CLEC may elect to pay Special Construction charges if they wanted BST to place facilities to a location where they do not currently exist. There will be instances where UCL-ND will not be available, (i.e., in an all fiber area.)

BellSouth Unbundled Copper Loop – Non-Designed

Service Capabilities – Continued

Options

BellSouth offers three options to assist the CLEC in converting existing end-users to its service. These options are described below:

1. BellSouth offers Order Coordination (OC) as a chargeable option per UCL-ND loop when reuse of existing facilities has been requested by the CLEC. The purpose of OC is to convert an existing facility to the CLEC's service in a manner that minimizes dial-tone interruption for the end user.
2. BellSouth also offers Order Coordination-Time Specific (OC-TS) conversions when the CLEC has ordered OC and requires a time specific order conversion. In addition to the OC charge, which is applied per loop, an OC-TS charge will be applied per UCL-ND order.
3. A CLEC may also order an EI Document that provides loop information similar to information provided on a DLR for an SL2 loop.

BellSouth Unbundled Copper Loop – Non-Designed

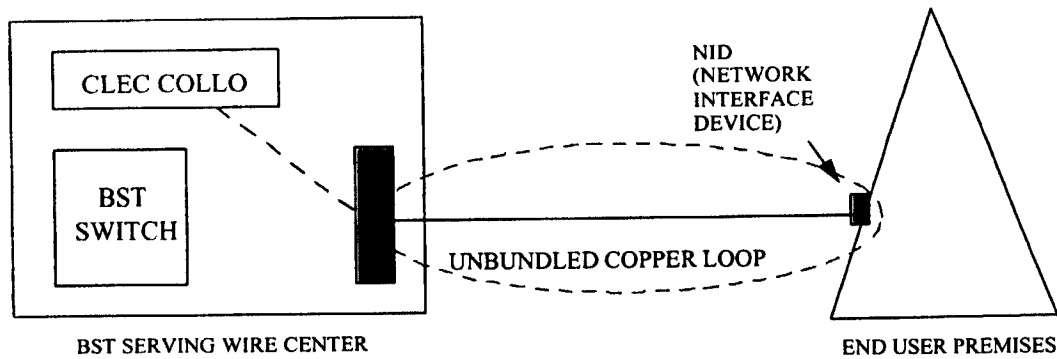
Technical Requirements

UCL-ND will be delivered to the CLEC at their collocation space via a cross- connect. Once this connection is made, the CLEC will provide connectivity needed to take the circuit back to its switch. .

UCL-ND will be provisioned as 2 Wire circuits and will meet technical specifications as described in **BellSouth's TR73600**.

BellSouth Unbundled Copper Loop – Non-Designed

Network Configuration



BellSouth Unbundled Copper Loop – Non-Designed

Ordering & Provisioning

The Local Carrier Service Center (LCSC) will receive and process orders by submission of the Local Service Request (LSR) from the CLEC. CLECs will utilize mechanized entry system where available.

Service Order Requirements

Local Service Request (LSR) Form

The CLEC will complete a Local Service Request (LSR) form according to the **BellSouth Business Rules for Local Ordering – TCIF 9/LSOG 4 or the LEO IG (Volume 1) - TCIF 7**. The following information is unique to UCL-ND and is also required on the LSR:

LSR Field	Information Required
NC 2 Wire UCL-ND	LXT-
DRC	LMU (Populated when the CLEC is requesting an Engineering Information (EI) Document from BellSouth)

The following forms are applicable to this product:

Local Service Request form	LSR
End User Information form	EU
Loop Service with Interim Number Portability	LS-INP
Loop Service	LS

The CLEC may send the paper LSR package via fax servers, courier service or U.S. Mail.

The LSR request may be submitted by the CLEC via mechanization.

BellSouth Unbundled Copper Loop – Non-Designed Rate Elements & USOCs

Rates for UCL-ND loops will need to be included in your contract. Rates may be interim and subject to true-up pending approval of final rates by the respective State Commissions. Commission orders will specify the dates back to which true-ups are applicable. Below are the rate elements for UCD-ND:

Rate Element	USOC
2 Wire UCL-ND	UEQ2X
Manual Order Coordination (Optional)	UEAMC
Order Coordination - Time Specific (Optional)	OCOSL
Engineering Information Document (Optional)	UEANM

Other Non-Recurring Charges

Expedite Charges – Applies if CLEC requests order interval less than the stated “standard interval” in the **BellSouth Products and Services Interval Guide** .

Manual Service Order – Applies if order is manually submitted and electronic ordering is available.

Order Cancellation – Applies if the CLEC cancels an order after the FOC (Firm Order Confirmation) has been issued.

Service Order Modification Charge – Applies if the CLEC modifies a service order after the Firm Order Confirmation has been issued.

Overtime Charge – Applies for work requested outside of normal working hours. Normal working hours for provisioning work requests is between 9 a.m. and 4 p.m. local time.

Time and Material – Applies for CLEC requested dispatch, (outside the central office), if “no trouble found.”

BellSouth Unbundled Copper Loop – Non-Designed

Intervals

Refer to the **BellSouth Products and Services Interval Guide** for the 2 Wire UCL-ND standard intervals.

Maintenance & Repair

The CLEC is responsible for testing and pre-screening any trouble conditions to ensure the trouble is with the UCL-ND loop before calling BellSouth. If the CLEC's testing isolates the repair problem to the UCL-ND loop, the CLEC should notify the CWINS (Customer Wholesale Interconnection Network Services) Center. CLEC will provide the results of the CLECs test, which would indicate a problem on the BellSouth provided loop.

The CLEC must provide the following information to CWINS when reporting a repair problem:

- UCL-ND Circuit ID Number
- CLEC Ported Number (If Applicable)
- Service Address of UCL-SLI Circuit in Trouble
- Description of Trouble
- Contact Name
- Contact Telephone Number

The UCL-ND is provisioned without a remote access test point, therefore, if a trouble is reported and no trouble is found, BellSouth will charge the CLEC for any dispatches and tests required to confirm the loop's working status.

BellSouth will perform these repair functions during normal hours (8 a.m. – 5 p.m. local time). If the CLEC requests that BellSouth repair a trouble after normal work hours, the CLEC will be billed the appropriate overtime charges.

BellSouth Unbundled Copper Loop – Non-Designed

Contract Specific Provisions

Before any UCL-ND compatible loop can be ordered, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for this loop. This agreement must be in effect for all states where the CLEC plans to order these unbundled loops.

The information contained herein applies to the UCL-ND general offering. The general offering is in accordance with BellSouth's policies, procedures and regulatory obligations as well as the standard BellSouth Interconnection Agreement.

The general offering does not address specific contract issues within a CLEC's Interconnection Agreement that may be different from the general offering. Where specific contract issues differ from the information provided here, the contract provisions will prevail for the term of the specific CLEC Interconnection Agreement. Otherwise, the general offering provisions will apply.

BellSouth Unbundled Copper Loop – Non-Designed

Acronyms

AFIG	Address and Facility Inventory Group
BST	BellSouth Telecommunications
CA/PR	Cable / Pair
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CWINS	Customer Wholesale Interconnection Network Services
DLR	Design Layout Record
DRC	Design Routing Code
EI	Engineering Information
EU	End User
FOC	Firm Order Confirmation
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LMU	Loop Make Up
LS	Loop Service
LS-LNP	Loop Service with Number Portability
LSR	Local Service Request
NC	Network Channel
NID	Network Interface Device
OC	Order Coordination
OC-TS	Order Coordination – Time Specific
SWC	Serving Wire Center
TR73600	Technical Reference 73600

BellSouth Unbundled Copper Loop – Non-Designed

Acronyms - Continued

UCL-ND	Unbundled Copper Loop – Non-Design
ULM	Unbundled Loop Modification
UNE	Unbundled Network Element
USOC	Universal Service Order Code
WMC	Work Management Center

EXHIBIT WGL-5

BellSouth Loop Makeup (LMU)

CLEC

**Pre-Ordering and Ordering Guide for Manual Loop
Makeup**

BellSouth Loop Makeup (LMU)

***CLEC
Pre-Ordering and Ordering Guide
For
Manual Loop Makeup***

(Issue 1.1 January 31, 2001)

1.1 Purpose

This document provides the Competitive Local Exchange Carrier (CLEC) with the current Unbundled Network Element (UNE) Pre-Ordering and Ordering information pertaining to BellSouth *Manual Loop Makeup (LMU)*. This document serves as a supplement to the CLEC Information Package (Version 2) of BellSouth Loop Makeup (LMU), with a posting date of 09/15/00.

The BellSouth LMU CLEC Information Package (Version 3) is located at the BellSouth Interconnection Services Web site in the CLEC Products Section at:

<http://www.interconnection.bellsouth.com/products/UNE/bstlmua.pdf>

1.2 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

This guide will be maintained until such time that it's content is incorporated into the BellSouth Business Rules – Local Ordering (BBR-LO). The BBR-LO is found at:

<http://www.interconnection.bellsouth.com/guides/leo.html>

1.3 Version History / Control

Any future modifications, enhancements, and/or improvements that are made to this Pre-Ordering and Ordering Guide for BellSouth *Manual Loop Makeup (LMU)* will be reflected accordingly in this section of the document.

Section	Date / Issue	Description
ALL	09/14/00 – Issue 1.0 01/31/01 – Issue 1.1 01/31/01 – Issue 1.1	Initial Issue Release Notify CLEC of receipt of Manual LMU request. Ch. 5. Requirement that for queries on ported TN, CLEC must use CKID. Ch. 5.

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CHAPTER 2.0 – Table of Contents

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CHAPTER 3.0 – Manual LMU Overview

3.1 Manual LMU Overview

Manual Loop Makeup (LMU) is requested via the **Manual Loop Makeup Service Inquiry (LMUSI)** process.

Manual LMU can be requested for either a working facility or for spare facilities using the following rate elements per Manual LMUSI:

USOC	Rate Element
UMKLW	MANUAL Loop Makeup - Preordering <u>Without</u> Reservation, per working facility queried
UMKLW	MANUAL Loop Makeup - Preordering <u>Without</u> Reservation, per spare facility queried [Maximum No. of Spare Facilities per Manual LMUSI is (3)]
UMKLP	MANUAL Loop Makeup - Preordering <u>With</u> Reservation, per spare facility queried [Maximum No. of Spare Facilities per Manual LMUSI is (3)]

BellSouth's provision of loop data to the requesting CLEC on working facilities is contingent upon ownership considerations of the loop, whether by BellSouth or the requesting CLEC. The requesting CLEC is not authorized to receive loop data on a loop owned by another CLEC.

Manual LMU of Spare Facilities may be requested With or Without Reservation. When the CLEC requests Manual LMU of Spare Facilities With Reservation, a Reservation ID is returned with the LMU information. The reservation ID is also known as a Facilities Reservation Number (FRN). Hereafter within this document, this code will be referred to as the "RESID/FRN".

The reservation holding timeframe is a maximum of four days from the time that BellSouth's loop makeup data is returned to the CLEC on the facilities queried. During this holding time that a Service Order is not placed, the reserved facilities are rendered unavailable to other customers, whether for CLEC(s) or for BellSouth. Reserved facilities for which the CLEC does not plan to place a UNE service order should be cancelled by the CLEC in a timely manner.

4.1 Availability

BellSouth will offer this product in all states within the BellSouth Region.

Per Manual LMUSI request, the CLEC may inquire for Manual Loop Makeup information on a

- single working facility, or
- maximum of three spare facilities

The **STANDARD SERVICE INTERVAL** for return of a response to Manual LMUSI is seven business days. This **STANDARD SERVICE INTERVAL** is a target interval. The interval is calculated from 'Receive Date' to 'LMU Return Date', and includes the time to render the Firm Order Confirmation (FOC). The FOC is rendered upon the issuance of the Billing Service Order. 'Receive Date' is defined as the date the Manual LMUSI is received by the designated BellSouth Account Team representative, and is counted as Day Zero. 'LMU Return Date' is defined as the date the LMU information is returned to the CLEC from BellSouth. The Interval calculation is reset to Zero when a CLEC initiated change occurs on the Manual LMU request. For a BellSouth initiated clarification to the CLEC to obtain correct information from the CLEC on its LSR, there may be a delay beyond the standard service interval in the return of a response to a Manual LMUSI request.

4.2 Contract Specific Provisions

Before a Loop Makeup Service Inquiry (LMUSI) may be submitted by the CLEC, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for the LMUSI(s) being requested. For more information on Contract Specific Provisions, refer to the BellSouth LMU CLEC Information Package.

4.3 Billing Information

Manual LMU will be billed from the Carrier Access Billing System (CABS) on a 'C' Billing Account Number (BAN). All activities herein described and associated with a unique Uniform Service Order Code (USOC) will incur a unique nonrecurring charge.

5.1 Description of Ordering Process

The following points describe the high level Manual LMU Order Process Flow. Detailed information is presented within this Chapter in the Sections that follow.

To Request Manual LMU:

1. CLECs request manual loop makeup information by submitting a Firm Order *Manual Loop Makeup Service Inquiry (LMUSI)* and a Local Service Request (LSR) form to the Complex Resale Support Group-UNE Group (CRSG), or to their direct Account Team for those CLECs not supported by the CRSG. Hereafter within this document, the use of "CRSG/Account Team" refers to both the CRSG-UNE Group and the direct Account Team, which ever is applicable.

NOTE: For those CLECs supported by the CRSG, refer to Chapter 7.0: Guidelines for Interfacing with the CRSG UNE Group.

2. BellSouth will provide an acknowledgement to the CLEC upon receipt of a Manual LMU request from the CLEC.
3. The CRSG/Account Team submits the LMUSI to the geographically appropriate Service Advocacy Center (SAC).
4. The SAC specialist prepares the LMU as specified on the LMUSI and returns the LMU, and the Facility Reservation (RESID/FRN), if requested, to the CRSG/Account Team.
5. The CRSG/Account Team sends the LMUSI and LSR to the Local Carrier Service Center (LCSC) for Billing Service Order issuance.
6. The LCSC issues the Billing Service Order for the Manual LMU.
7. The LCSC renders the Firm Order Confirmation (FOC).
8. Once the FOC has been rendered, the CRSG/Account Team returns the LMU and the RESID/FRN, if applicable, to the CLEC.

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5.1 Description of Ordering Process

Continued from previous page

To Cancel Reservation(s):

1. To cancel a reservation on spare facilities, the CLEC submits the LMUSI form to the CRSG/Account Team with the Cancel FRN item indicated.
2. The LSR form is not required.
3. The CRSG/Account Team sends the Cancel FRN LMUSI to the SAC.

To Cancel Pending LMUSI:

1. To cancel a pending Manual LMUSI, for which no Loop Makeup information has been processed, the CLEC submits the LMUSI form to the CRSG/Account Team with the Cancel LMUSI item indicated.
2. The LSR form is not required.
3. The CRSG/Account Team sends the Cancel LMUSI to the SAC.

5.2 Submitting a Request

For a *Manual* Loop Makeup request, the CLEC prepares and submits the

- Local Service Request (LSR) Form, Local Service Ordering Guidelines Version 4 (LSOG 4) or later, and
- Loop Makeup Service Inquiry (LMUSI) Form

A copy of the LSR Form is available at the BellSouth Interconnection Services Web site in the CLEC Customer Guides Section at:

http://www.interconnection.bellsouth.com/guides/bst_lsog4.html

A copy of the LMUSI Form is located at the end of this Guide.

Both forms must be typewritten.

The CLEC submits the LSR and the LMUSI forms together to the CRSG/Account Team for processing. See Chapter 7.0: Guidelines for Interfacing with the CRSG UNE Group of this Guide when submitting requests to the CRSG.

For a working pair LMUSI, the end user's address will be required along with either the telephone number or the circuit ID (CKID).

For spare facilities LMUSI, only the address of the service location is required.

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CHAPTER 5.0 – Ordering Manual LMU

5.3 Manual LMUSI Instructions

Instructions for preparing the LMUSI Form follow. The instructions are organized by Section, by field.

The LMUSI is a two-page form. Page 2 is only required if LMU is being requested for more than one facility. A maximum of three facilities may be requested for a single service address per LMUSI request.

The form MUST be typewritten. Unless otherwise noted, there are no restrictions regarding length of fields or alphanumeric makeup of required information.

Section: "General Information "

Field	Instruction
Firm Order	Select for initial request
Cancel LMUSI	Select to cancel <u>pending</u> LMUSI for which LMU has not yet been processed
Cancel FRN	Select to cancel RESID/FRN for pair(s) previously reserved
Change	Select to update a pending Firm Order request
SI# (PON Number)	Enter the CLEC unique Purchase Order Number (PON). This entry always required.
Negotiator	Refers to the BellSouth CRSG/Account Team Representative Name
Negotiator's Tel Number	Refers to the BellSouth CRSG/Account Team Representative TN

NOTE: the reference "CRSG EMAIL ADDRESS: (CRSG UNE/m5,mail5a)" is for BellSouth use.

Section: "Customer Information"

Request Options: Select *Only One* of the Three Choices

1. Provide LMU at Telephone Number/CKID
2. Provide LMU at specified address for spare copper pair (loop facility)
3. Provide LMU at specified address for spare Digital Loop Carrier (DLC) pair

If Selected	Then Provide	
LMU for working facility	Telephone number, or, Circuit ID (CKID)	
LMU for spare copper pair	Number of spare pairs required – Maximum 3	Reserve Pair(s)? YES / NO
LMU for spare DLC pair	Number of spare DLC pairs required – Maximum 3	Reserve Pair(s)? YES / NO

NOTE On a Working Facility: For request on ported TNs, CLECs must use CKID

NOTE If Spare Facility(-ies): CLECs cannot request a mixture of copper and DLC pairs on a single LMUSI spare facility request. CLEC should provide a Y/N response regarding its choice for a reservation of the facility queried.

Continued on next page

5.3 Manual LMUSI Instructions

Section: "Customer Information", continued from previous page

Field	Instruction
Service Address	Enter the Local Exchange Navigation System (LENS), Telecommunications Gateway (TAG), or RoboTAG™ validated Service Address. Include any dept/floor/suite/room/apartment number, as well as, the U.S. postal zip code. This entry always required.
CLEC Company Name	Enter the requested information. This entry always required.
CLEC Contact/Tele No.	Enter the requested information. This entry always required.
Local Serving Central Office Common Language Location Identifier (CLLI)	Enter the eight character Serving Wire Center CLLI code. This entry always required.

Section: "Comments"

This section is always required with **Cancel FRN**.

Enter the FRN and Cable/Pair information for the reservation being cancelled.

5.4 Manual LSR Instructions

Instructions for preparing the Manual LSR Form follow. The instructions are organized by Section, by field.

Only the sections and fields specified herein (rather than the entire LSR Form) are required for purposes of processing a Manual LMUSI.

The form MUST be typewritten, using the LSOG 4 Version form. Please note specifications on length and alphanumeric makeup of required information.

Section: "Administrative Section"

Field	Instruction
CCNA	Enter the 3 Alpha Character Code Assigned to CLEC
PON	Enter the CLEC unique PON – MUST match SI# (PON) field of associated LMUSI
VER	Will be populated if sending a SUPP
LOCQTY	Enter the number of Loop Makeups being requested
SC	Always LCSC
PG OF	Enter the requested information
D/TSENT	Enter the requested information
DDD	Enter the requested information
REQTYP	Always AB
ACT	Always N
SUPP	Will be populated if sending a SUPP
CC	Enter the 4 character Numeric Code Assigned to CLEC
ACTL	Enter the CLEC 11 character CLLI code for the Serving Wire Center (SWC), where CLEC is physically or virtually collocated in BellSouth SWC
TOS	Always 1BF

Section: "Bill Section"

Field	Instruction
BAN1	Enter the established "C" BAN, or, "N" if BAN is not established. See NOTE below regarding "C" BAN
ACNA	Enter the 3 Alpha Character Code Assigned to CLEC

NOTE: If the CLEC does not have an established "C" BAN, populate this field with an "N" and the Local Carrier Service Center (LCSC) Service Representative will establish the "C" BAN for the CLEC. (See procedures below for how to establish a "C" BAN)

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5.4 Manual LSR Instructions

Section: "Bill Section", continued from previous page

Procedures for Establishing "C" BAN: The fields listed below are required in order to establish a "C" BAN for the CLEC. If the CLEC's "C" BAN is already established, and thus, the CLEC populates this in the "BAN1" field on the LSR form, then the CLEC will not need to fill in the fields below.

Field	Instruction
BILLNM	Enter CLEC Company Name
STREET	Enter the requested information
FLOOR	Enter the requested information
ROOM	Enter the requested information
CITY	Enter the requested information
STATE	Enter the requested information
ZIP CODE	Enter the requested information
BILLCON	Enter Contact at CLEC
TEL NO	Enter the requested information

The CRSG/Account Team will check the LSR form to insure that the "BAN1" field is populated with either a "C" BAN number, or, an "N", the latter of which would prompt the LCSC to establish a "C" BAN for the CLEC. If the "BAN1" field is not populated, then the CRSG/Account Team will clarify the LSR and LMUSI, returning both manual forms back to the CLEC for completion.

If a "C" BAN is established for the CLEC, it is returned via the FOC.

Section: "Contact Section"

Field	Instruction
FAX NO	Enter the FAX number where Firm Order Confirmation (FOC) is to be sent by the LCSC
INIT	Enter Name of person at CLEC who initiated LSR
TEL NO	Enter Telephone number of CLEC Initiator

A Reminder When Filling Out the LSR: If a CLEC is sending in an LSR for purposes of a Supplement (SUPP), then the CLEC must populate the "VER" and "SUP" fields on the LSR, business as usual (BAU).

5.5 The LMUSI Response

Information presented on the LMUSI Response is as follows.

Section: "Outside Plant Engineering Makeup Data (Nth) Requested Pair"

If the LMU was requested on a working Telephone Number/Circuit ID, Outside Plant Engineering (OSPE) will fill in the Cable and Pair numbers, and list the loop makeup of that Cable and Pair facility.

If spare facilities were requested and are available, Outside Plant Engineering (OSPE) will fill in the Cable and Pair numbers; will populate the FRN if a reservation was requested by the CLEC; and list the loop makeup of that Cable and Pair facility.

If spare facilities are not available, or if the number of pairs available is less than the number requested, OSPE will indicate in the **Comments** section no spare pairs are available or that only some of the pairs are available.

5.6 The LMU Content

Loop Makeup Data is defined as the physical characteristics of the loop facilities, starting at the BST central office (CO) listed in chronological order and ending at the serving distribution terminal. Loop makeup data will consist of cable gauge and length, bridged taps (BT), load coils (LC), presence of Digital Loop Carrier (DLC) and any other equipment that is part of the local loop facilities.

The loop makeup will be listed as cable sections (e.g., F1, F2, etc.) on the LMUSI response in chronological order starting at the CO and ending at the end user serving terminal. Each section of cable (F1, F2, etc.) is distinguished by the presence of a crossbox, as indicated by an X at the appropriate point within the loop makeup response. (For example: Cable F1 would run from the CO to the first cross box; Cable F2 would run from the first crossbox to the second cross box or to the end user's serving terminal.) Facility cable sections will include the cable gauge, the length of the cable, as well as any load coils and bridged taps contained within that cable section. Length is measured in kilofeet ("kft"). The location of load coils will be indicated by the code "LC"; bridge tap will be indicated by the code "BT". The LMU response will also include the length of the bridge tap. If the loop makeup includes DLC the type of DLC will be indicated.

An example of a loop makeup response is as follows:

26NL - 10 kft	(The first facility cable section, F1, is non-loaded 26 gauge)
BT; 26NL - 2 kft	(F1 also includes BT at the end of 10 kft; the BT is 26 gauge for 2.0 kft)
X	(Location of first crossbox; thus, F1 length is a total of 12 kft)
26NL - 2 kft	(The second facility cable section, F2, is non-loaded 26 gauge)

The total length of the facility in this example would be 14 kft. Responses for manual loop makeup will be provided in a similar fashion.

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5.6 The LMU Content

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Use the following key to interpret the information returned on the loop makeup:

Code	Description
26NL	Indicates a section of 26-gauge cable non-loaded.
24NL 22NL 19NL	The other gauges are listed similarly. Changes to the numbers indicate the gauge (24NL, 22NL, and 19NL). Following this section designation is the length of the section in kilofeet to one decimal place.
26H88	Indicates a section of 26-gauge cable 88 millihenry loading.
24H88 22H88 19H88	The other gauges are listed similarly. Changes to the numbers indicate the gauge (24H88, 22H88, AND 19H88) and the loading marked as appropriate. The H indicates 6000 foot spacing between load coils; a D would represent 4500 foot spacing. The numbers following the H or D indicate the amount of inductance in millihenries.
LC	Location of a load coil. Following the LC indicator is the distance from the CO in kilofeet to one decimal place.
X	Location of a cross connect facility.
BT	Indicates that the following section is a Bridged tap. The bridged tap will be listed using the cable gauge and loading indicator above. Following the BT indicator is the length of the bridged tap section in kilofeet to one decimal place.
BOC.xxx	Indicates the location of a build out capacitor and its capacitance in microfarads.
DLC	Indicates the presence of Digital Loop Carrier (DLC). Following the DLC indicator is the type of DLC, e.g. DLC, Series 5.

6.1 Placing a UNE Service Order

Once the CLEC has received the LMU of a working TN or CKID, or received the LMU of spare facility(ies), and optionally reserved single or multiple spare pairs, the CLEC may determine if they wish to place an order for **BellSouth Unbundled Loop Modification CLEC Information Package** and/or for a UNE Service Order (e.g. for a 2-wire ADSL compatible loop). For such a UNE Service Order, either refer to **BellSouth Unbundled ADSL/HDSL Compatible Loops CLEC Information Package**, or to **BellSouth Unbundled Copper Loop CLEC Information Package**.

This information referenced above is located at the BellSouth Interconnection Services Web site in the CLEC Products Section at:

<http://www.interconnection.bellsouth.com/products/unes.html>

7.1 Submitting LMUSI & LSR to the CRSG UNE Group

Internet Email is required to submit LMUSI and LSR Forms to the CRSG UNE Group.

The following guidelines should be followed when submitting requests to the CRSG UNE Group.

Guidelines for Interfacing with the CRSG UNE Group

- In order to serve customers as efficiently as possible for manual requests, the CLEC should communicate with the CRSG UNE Group via email, whenever possible. New orders, CLEC initiated corrections, and clarification responses should be submitted via email
- The CRSG UNE Group email address is crsg.une@bridge.bellsouth.com.
- When submitting the request via email, submit only 1 PON (SI & LSR) per mail message
- Use the following guidelines in formatting the email subject header

Email Subject Header	Purpose
PON 12345 UNE NEW	For a new UNE order
PON 12345 CORRECTION	For a CLEC initiated correction or update
PON 12345 CLARIFICATION RESPONSE	For a clarification response
PON 12345 CANCEL	For a cancellation
PON 12345 STATUS	For a status request

Every effort should be used to submit requests to the CRSG UNE Group via Internet Email. In cases of extreme circumstances when Internet Email is not available, contact the UNE Group Sales Support Manager as indicated in Section 7.6 CRSG UNE Group Escalation Procedures of this document.

7.2 Verification Performed by the CRSG UNE Group

The CRSG UNE Group verifies the following fields on the LMUSI and LSR:

Form	Fields Verified
LMUSI	CLLI, ADDRESS, # OF SPARE PAIRS
LSR	ACTL, IBAN for "C" or "N"

7.3 Reporting Status to the CLEC

The CRSG UNE Group provides CLECs with the "Open PON Status Report" on a daily basis. The purpose of the report is to provide status of the PONs open in the CRSG for processing. A PON is considered closed in the CRSG once the PON has either been FOCd by the LCSC, or, the PON has been Cancelled. Once a PON has been posted 'Closed', it will no longer appear on the Open PON Status Report.

The report is pulled once per day, after 4:00pm CST, and sent via email to the designated recipient.

The following note is attached to each report:

"Because of the volume of PONs received, all PONs submitted for processing may not appear on this report today. However, they will appear on the report for the next business day. PONs received after 3:00pm CST will also appear on the report for the next business day. If possible, please allow two business days for PONs to appear on this report before checking the status or re-sending.

If you have questions regarding a particular PON listed, please inquire according to the UNE status process."

The report shows the following information:

- CLEC NAME
- DATE RECEIVED
- END USER NAME
- STATE
- TYPE OF SERVICE
- PON NUMBER
- CLARIFICATION DATE – IN & OUT
- DATE OF SERVICE INQUIRY
- DATE SENT TO LCSC
- CANCELLATION, if applicable
- NOTES TO CLEC

7.4 To Request UNE Status

To request PON specific UNE Status, the CLEC should send an Internet Email message to the CRSG UNE Email address at:

crsg.une@bridge.bellsouth.com

The Email message header should read as follows:

PON 12345 STATUS

where '12345' represents the PON Number, e.g. PON AL987654-00 STATUS.

7.5 To Specify CLEC Recipient of Open PON Status Report

To request a change to the Email Distribution List of the Open PON Status Report, send an Internet Email message to the CRSG UNE Email mailbox as stated in 7.4 above.

The Email message header should read as follows:

CHANGE DISTRIBUTION LIST

7.6 CRSG UNE Group Escalation Procedures

The following steps should be followed to initiate escalation within the CRSG UNE Group:

First Level of Escalation	Systems Designer assigned to the order
Second Level of Escalation	Customer Care Advocate Sharon Arnold (205) 321-3306
Third Level of Escalation	Sales Support Managers Cheryl Lewis (205) 321-4607 Ruby Neely (205) 321-4621
Fourth Level of Escalation	Sales Support Director Tracey Morant (205) 321-3192

General Information:

(Page 2 is only required if CLEC is requesting more than one loop.)

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Loop Makeup Service Inquiry

SI # (PON Num.) _____ Firm Order _____ Change _____ Cancel FRN _____ Cancel LMU SI _____
Negotiator _____
Negotiator Telephone Number _____
CRSG EMAIL ADDRESS: (CRSG UNE/m5.mail@a) _____

Customer Information:(Choose one of the following three choices. CLEC to indicate loop makeup type required, by telephone number/CKID, spare at address/copper or spare at address/DLC)

_____ Provide LMU at Telephone Number/CKID _____
_____ Provide LMU at address listed below for spare copper pair. _____ Number of spare copper pairs required (Max. 3)
_____ Reserve Pair(s) in database (Y/N)? _____
_____ Provide LMU at address listed below for spare DLC pair. _____ Number of spare DLC pairs required (Max. 3)
_____ Reserve Pair(s) in database (Y/N)? _____

Service Address _____ CLEC Name _____
_____ CLEC Contact/Telephone number _____
_____ Local Serving Central Office CLLI _____

Outside Plant Engineering Makeup Data First Requested Pair:

Fill in Cable, pair and FRN if spares requested. Fill in FRN if reservation is requested.

Cable F1: _____ Pair: _____ FRN: _____
Cable F2: _____ Pair: _____
Cable F3: _____ Pair: _____
Cable F4: _____ Pair: _____

This is a loop makeup for facilities at the above cable and pair or telephone number indicated in Customer Information Section.

Comments

Prepared by (Facility Engineer) _____ Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred.

Revised 08-30-00

"The information contained herein is based upon BellSouth's records. This is the same information that BellSouth uses to determine loop compatibility for its own services. BellSouth cannot and does not warrant that the information contained herein is accurate in every case."

Loop Makeup Service Inquiry

SI # (PON Num.) _____ Negotiator _____

Negotiator Telephone Number _____

CRSG EMAIL ADDRESS: (CRSG UNE/m5.mail5a) _____

Outside Plant Engineering Makeup Data Second Requested Pair:

Fill in Cable, pair and FRN if spares requested. Fill in FRN if reservation is requested.

Cable F1: _____ Pair: _____ FRN: _____
Cable F2: _____ Pair: _____
Cable F3: _____ Pair: _____
Cable F4: _____ Pair: _____

This is a loop makeup for facilities at the above cable and pair.

Outside Plant Engineering Makeup Data Third Requested Pair:

Fill in Cable, pair and FRN if spares requested. Fill in FRN if reservation is requested.

Cable F1: _____ Pair: _____ FRN: _____
Cable F2: _____ Pair: _____
Cable F3: _____ Pair: _____
Cable F4: _____ Pair: _____

This is a loop makeup for facilities at the above cable and pair.

Comments

Prepared by (Facility Engineer) _____ Telephone Number _____

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred.

Revised 08-30-00

"The information contained herein is based upon BellSouth's records. This is the same information that BellSouth uses to determine loop compatibility for its own services. BellSouth cannot and does not warrant that the information contained herein is accurate in every case."